



Provider Monitoring Report

BIIAB Qualifications Limited

11 April 2024 to 16 April 2024

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1 Background

Two providers were remotely monitored between 11 April 2024 and 16 April 2024.

1.1 Scope

SQA Accreditation carries out quality assurance activity in line with its Quality Assurance of Approved Awarding Bodies Policy. This involves monitoring a sample of the awarding body's approved providers or assessment sites. Provider monitoring visits will be conducted in a consistent manner within and between providers.

The aim of monitoring is to:

- ◆ ensure the awarding body's compliance with SQA Accreditation's regulatory requirements
- ◆ confirm that quality assurance arrangements are being conducted by the awarding body in accordance with its prescribed arrangements
- ◆ ensure that quality assurance arrangements are being conducted in a consistent manner, within and between providers
- ◆ ensure that providers are receiving the appropriate guidance, support and documentation from the awarding body in order to facilitate a high standard of qualification delivery
- ◆ inform future audit and monitoring activity for the awarding body

All Principles may be included within the scope of the provider monitoring activity.

Awarding body documentation considered for review includes all documents banked on the awarding body's SharePoint Place at the time of provider monitoring and information supplied by providers to support provider monitoring activity. Restricted or commercially sensitive information gathered during SQA Accreditation's quality assurance activities is treated in the strictest confidence.

SQA Accreditation provider monitoring reports are written by exception focusing only on those areas where corrective action is required or recommended.

1.2 Provider Monitoring Report Timescales

BIIAB Qualifications Limited provider monitoring dates: 11 April 2024 to 16 April 2024

Provider Monitoring Report approved by
Accreditation Co-ordination Group on: 26 June 2024

Provider Monitoring Report to be signed by BIIAB
Qualifications Limited: 8 August 2024

Action Plan to be emailed to regulation@sqa.org.uk
by BIIAB Qualifications Limited 8 August 2024

The process will apply in relation to the timescales specified above:

- ◆ The awarding body will be sent a copy of the Provider Monitoring Report by email.
- ◆ The awarding body must sign the copy of the Provider Monitoring 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 Action Plan and return by email to SQA Accreditation.

The findings of this Provider Monitoring 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 Provider Monitoring 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 BIIAB Qualifications Limited as a separate document to the Provider Monitoring Report and must be submitted to SQA Accreditation in accordance with the timescale specified in 1.2.

As a result of the provider monitoring activity, 10 Issues have been recorded and two Recommendations have been noted.

Issue	Detail of Issue recorded	Risk rating
1. Principle 5	BIIAB Qualifications Limited must ensure that its providers have a register which confirms that all invigilators have received an induction to the role of invigilator and its policies and procedures, which must be signed by the invigilator to confirm that they have received this induction, as stipulated in the <i>Security Centre Delivery and Awarding Manual (V1.22–23)</i> .	Low
2. Principles 5 and 9	BIIAB Qualifications Limited must ensure that its providers have a conflict of interest policy, and that they comply with BIIAB Qualifications Limited’s <i>Centre Conflict of Interest (21–22)</i> , and ensure that if any conflicts of interest occur, its providers follow this policy.	High
3. Principles 5 and 9	BIIAB Qualifications Limited must ensure that it provides clear information on its procedures, products and services and ensures that these are accurate and appropriate to accredited qualifications and Security Industry Authority (SIA) <i>Get Training Requirements for awarding organisations and training centres delivering SIA licence to practice qualifications First published February 2021 Last updated July 2023</i> .	Medium
4. Principle 9	BIIAB Qualifications Limited must review its providers’ data protection policies to ensure they comply with current data protection legislation.	Low
5. Principles 9 and 13	BIIAB Qualifications Limited must ensure that its providers’ training, delivery and assessment for both the BIIAB Award for Door Supervisors in the Private Security Industry (Scotland) at SCQF level 6 qualification and BIIAB Award for Door Supervisors in the Private Security	Medium

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	Industry Top Up qualification does not exceed eight hours a day and that its providers complete detailed registers, signed daily by its learners.	
6. Principle 13	BIIAB Qualifications Limited must ensure that its providers comply with requirements for trainer / assessors delivering licence-linked qualifications, as stipulated in the <i>Get Training Requirements for awarding organisations and training centres delivering SIA licence to practice qualifications. First published February 2021 Last updated July 2023.</i>	Medium
7. Principle 15	BIIAB Qualifications Limited must ensure that it results and certificates its learners within the timescales stipulated in the <i>Centre Manual for the Administration of BIIAB Qualifications within the Security Portfolio.</i>	Medium
8. Principles 9 and 16	BIIAB Qualifications Limited must ensure that its providers' complaints policies reference how and when its learners can escalate a complaint to the appropriate awarding body and appropriate regulator.	Low
9. Principles 9 and 17	BIIAB Qualifications Limited must ensure that its providers' appeals policies make it clear that SQA Accreditation is unable to overturn assessment decisions or academic judgements.	Low
10. Principles 9 and 18	BIIAB Qualifications Limited must ensure that their providers' procedures have a route for reporting all cases of actual or suspected malpractice to them so that these can be reported to SQA Accreditation and that they inform SQA Accreditation when any actual or suspected cases of malpractice or maladministration are identified.	High

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. Principles 5 and 9	BIIAB Qualifications Limited may wish to remind its external quality assurers (EQA) to check that its providers are providing clear and accurate information on its joining information.

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2. Principles 6 and 15	BIIAB Qualifications Limited may wish to consider notifying or alerting its providers when its learner results and certificates are available to download.
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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 provider monitoring will count towards BIIAB Qualifications Limited'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 Good Practice, Issues and Recommendations

The following sections detail:

- ◆ good practice noted by providers
- ◆ Issues recorded and Recommendations noted against SQA Accreditation's regulatory requirements

2.1 Good Practice

The following area of good practice were noted by providers:

Provider 2 highlighted:

- ◆ happy with communication with EQA generally pretty responsive and quick to respond

2.2 Issues

Regulatory Principle 5. The awarding body and its providers must provide clear information on their procedures, products and services and ensure that they are accurate and appropriate to accredited qualifications.

On page 20 of the *Security Centre Delivery and Awarding Manual (V1.22–23)*, under 'Section 8 Invigilation' it states that 'All invigilators must receive an induction to the role of invigilation and its policies and procedures. Training centres must maintain a register which must be signed by the invigilator to confirm that they have received this induction'.

The provider-devised Invigilator training declaration given to the Accreditation Auditor by provider 2 was written to comply with a competitor awarding body's invigilation documentation and procedures. It does confirm that four invigilators were inducted to the role of invigilation for a competitor awarding body in May 2022.

However, this does not register when one of its current invigilators received induction to the role of invigilation and its policies and procedures, as stipulated in the *Security Centre Delivery and Awarding Manual (V1.22–23)*.

BIIAB Qualifications Limited must ensure that its providers have a register which confirms that all invigilators have received an induction to the role of invigilator and its policies and procedures, which must be signed by the invigilator to confirm that they have received this induction as stipulated in the *Security Centre Delivery and Awarding Manual (V1.22–23)*.

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

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Regulatory Principle 5. The awarding body and its providers must provide clear information on their procedures, products and services and ensure that they are accurate and appropriate to accredited qualifications.

Regulatory Principle 9. The awarding body and its providers must maintain accurate documents, records and data.

On page 2 of BIIAB Qualifications Limited *Centre Conflict of Interest (21–22)* it states the following:

‘1.5 The following are examples of potential conflicts of interest. This list is by no means exhaustive, Centres must identify their own in line with their own business models.

- A member of staff works for a Centre and a family member takes a qualification at the same Centre;
- A member of staff at the Centre is completing a qualification delivered and assessed by the Centre;
- Tutor / assessor / internal verifier (IV) working with more than one Centre or private training provider;
- Tutor / assessor / IV partaking in the appointment, promotion, supervision or evaluation of a person with whom they have family connections;
- A member of Centre staff involved in the delivery / outcome of a qualification having a family connection with a registered learner or learner’s family.’

‘1.6 Centres are required to keep records of declared conflicts of interest and inform BIIAB Qualifications Limited of such conflicts that may impact on the delivery, assessment and internal quality assurance of its qualifications. BIIAB Qualifications Limited will determine and agree with the centre what if any additional action needs to be taken.’

A review of learner certificates and assessment material provided to the Accreditation Auditor by provider 2 confirmed that one member of staff at the centre had completed the BIIAB Award for Door Supervisors in the Private Security Industry (Scotland) at SCQF level 6 qualification and another member of staff at the centre had completed the BIIAB Award for Door Supervisors in the Private Security Industry Top Up qualification both delivered and assessed by the centre in February 2024.

In addition, provider 2 was unaware they had to declare potential conflicts of interest for both members of staff and report these to BIIAB Qualifications Limited as these conflicts may impact on the delivery, assessment and internal quality assurance of its qualifications.

On page 20 of the *Security Centre Delivery and Awarding Manual, (V1, 22–23)* under ‘Section 8 Invigilation’ it states that ‘Training centres need to consider all potential conflicts of interest and have an appropriate policy in place to support this.’

Provider 2 confirmed by email to the Accreditation Auditor in March 2024 that they do not have a conflict of interest policy.

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BIIAB Qualifications Limited must ensure that its providers have a conflict of interest policy and that they comply with BIIAB Qualifications Limited's *Centre Conflict of Interest (21–22)*, and ensure that if any conflicts of interest occur, its providers follow this policy.

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

Regulatory Principle 5. The awarding body and its providers must provide clear information on their procedures, products and services and ensure that they are accurate and appropriate to accredited qualifications.

Regulatory Principle 9. The awarding body and its providers must maintain accurate documents, records and data.

On reviewing the *Qualification Guidance: BIIAB Award for Door Supervisors in the Private Security Industry (Scotland) at SCQF level 6 (Version 3.1, January 2024)* the Accreditation Auditor noted the following inaccuracies:

- ◆ On page 4 'About the BIIAB Award for Door Supervisors in the Private Security Industry (Scotland) at SCQF Level 6' it states that 'BIIAB Qualifications Limited is regulated to deliver this qualification by Ofqual in England'.
- ◆ On page 5 'What are Rules of Combination (ROC)' is not a requirement of SQA Accreditation.
- ◆ On page 19 'Format of Units' it states that 'This will be shown as it appears on the Register of Regulated Qualifications (<http://register.ofqual.gov.uk>)'.

In the *Qualification Specification BIIAB Award for Door Supervisors in the Private Security Industry (Top up), (Version 3, August 2021)* the following inaccuracies were noted:

- ◆ On page 3 'About the BIIAB Award for Door Supervisors in the Private Security Industry (Top up)' it states that 'BIIAB Qualifications Limited is regulated to deliver this qualification by the Scottish Qualifications Authority (SQA)'.
- ◆ On page 5 'What are Rules of Combination (ROC)' is not a requirement of SQA Accreditation.
- ◆ On page 19 'Format of Units' it states that 'This will be shown as it appears on the Register of Regulated Qualifications (<http://register.ofqual.gov.uk>)'.

In addition, on page 3 of the *Security Centre Delivery and Awarding Manual, (V1, 22–23)* under 'Section 1 – Introduction' it states the following:

'This Security Centre Delivery and Awarding Manual has been produced to provide approved centres offering the BIIAB suite of Security Industry Authority (SIA) Licence Linked Qualifications with the relevant information to understand BIIAB's systems and processes for the delivery and quality assurance of BIIAB SIA qualifications suite.'

'This manual should be read in conjunction with the following important documents:

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1. BIIAB Qualification Specifications which provide all the necessary detail for each of the SIA Licence Linked Qualifications can be found on the BIIAB website.¹
2. The SIA's 'Get Training' ² document for Awarding Organisations and Training Providers.
3. This document is written in accordance with various BIIAB Policies and Procedures including:
 - a. BIIAB Fee List.
 - b. BIIAB Centre Recognition Policy.
 - c. BIIAB Qualification Approval Policy.
 - d. BIIAB Centre Agreement.

¹ Security Qualifications: BIIAB

² SIA Get Training Publication - <https://assets.publishing.service.gov.uk/>

However, the SIA Get Training Publication link takes you to an out-of-date version of the *SIA Get Training Requirements for awarding organisations and training centres delivering SIA licence to practice qualifications First published February 2021 | Last updated April 2022*. The most up-to-date version of this document was last updated in July 2023.

Lastly, on reviewing the *Get Training Requirements for awarding organisations and training centres delivering SIA licence to practice qualifications First published February 2021 | Last updated July 2023*, on page 21 under the subject heading 'Use of self-study' it states the following:

'ACT Awareness and ACT Security are the only permitted e-learning training packages that can be used as self-study for Learning Outcome 9 of the Principles of Working in the Private Security Industry. Where the ACT Awareness and ACT Security are completed online, the centre must retain copies of the candidate's certificate in order to confirm mandatory hours have been completed. Self-study material must be kept for a minimum of three years and applies to the following content:

'Up to 10 hours of Principles of Working in the Private Security Industry (PWPSI)

'Learning Outcome that can be delivered via self-study

LO1: Know the main characteristics and purposes of the private security industry (2 hours)

LO2: Understand legislation as it applies to a security operative (2 hours)

LO4: Understand the importance of safe working practices (2 hours)

LO5: Understand fire procedures in the workplace (1 hour)

LO9: Terror Threat Awareness (ACT) Awareness and ACT Security only (2 hours)

LO11: Understand good practice for post incident management (1 hour)'

However, on page 21 of the *Centre Manual for the Administration of BIIAB Qualifications within the Security Portfolio (v48 09-08-2021)* under the 'Section 6.6 Use of self-study' it states the following:

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'Self-study may be used to deliver up to eight hours of Principles of Working in the Private Security Industry (PWPSI). The Learning Outcomes that can be delivered via distance learning are:

- LO1: Know the main characteristics and purposes of the Private Security Industry (2 hours)
- LO2: Understand legislation as it applies to a security operative (2 hours)
- LO4: Understand the importance of safe working practices (2 hours)
- LO5: Understand fire procedures in the workplace (1 hour)
- LO11: Understand good practice for post incident management (1 hour)

In addition, on page 28 of the *Get Training Requirements for awarding organisations and training centres delivering SIA licence to practice qualifications First published February 2021 | Last updated July 2023* under the subject heading 'Assessing individual units' it states that:

'Practical assessments must be visually (video) and orally recorded. This must include the question-and-answer sessions for Conflict Management and Physical Intervention unless the learner is under 18 years of age (see 'Age restrictions for qualifications' above). Video recordings must be retained for a minimum of one year for audit purposes.'

However, on page 24 of *Centre Manual for the Administration of BIIAB Qualifications within the Security Portfolio (v48 09-08-2021)* under 'Section 7.2 Assessment of Individual Units' it states that:

'All knowledge and practical assessment evidence (including visual recordings) must be retained for a minimum of three years for audit purposes. All internal assessments must be internally quality assured and are subject to external quality assurance.'

BIIAB Qualifications Limited must ensure that it provides clear information on their procedures, products and services and ensure that they are accurate and appropriate to accredited qualifications and SIA *Get Training Requirements for awarding organisations and training centres delivering SIA licence to practice qualifications First published February 2021 | Last updated July 2023*.

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

Regulatory Principle 9. The awarding body and its providers must maintain accurate documents, records and data.

On reviewing the data protection policy given to the Accreditation Auditor by provider 2, the Accreditation Auditor noted that it makes no reference to United Kingdom General Data Protection Regulation (UK GDPR). UK GDPR and Data Protection Policy 2018 together makes up current data protection legislation in the UK.

The data protection policy for provider 2 inaccurately refers to the Data Protection Policy 1998 and to eight principles where there are currently seven UK GDPR key principles, which came into effect on 1 January 2021.

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BIIAB Qualifications Limited must review its providers' data protection policies to ensure they comply with current data protection legislation.

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

Regulatory Principle 9. The awarding body and its providers must maintain accurate documents, records and data.

Regulatory Principle 13. The awarding body and its providers must ensure that they have systems and processes which ensure the effective quality assurance of accredited qualifications.

On page 16 of the *Centre Manual for the Administration of BIIAB Qualifications within the Security Portfolio (v48 09-08-2021)* under 'Section 6.5 Standard Delivery' it states the following:

'Each day should not exceed eight hours of contact time.

'Training centres must retain detailed registers that include start / end / break times of training for each day and must be signed daily by the learners. This includes a record of any late arrivals/early leavers and how these learners made up the required hours which they missed. These must be retained for audit purposes. Training centres must retain this information for a minimum of three years in line with retention of assessment evidence requirements.'

Provider 1 provided the Accreditation Auditor with a detailed register for the BIIAB Award for Door Supervisors in the Private Security Industry Top Up qualification delivered in November 2023 for one out of two days of training.

The detailed registers provided to the Accreditation Auditor by provider 2 confirmed that training, delivery and assessment of the BIIAB Award for Door Supervisors in the Private Security Industry (Scotland) at SCQF level 6 qualification was delivered in February 2024 over six days. However, two out of the six days of training, delivery and assessment had recorded nine hours of contact time.

In addition, the detailed registers provided by provider 2 for the BIIAB Award for Door Supervisors in the Private Security Industry Top Up qualification delivered over two days in February 2024 confirmed that training, delivery and assessment for day one recorded nine hours of contact time and day two recorded 10 hours 30 minutes of contact time.

Therefore, providers 1 and 2 have not complied with the requirements as stipulated in the *Centre Manual for the Administration of BIIAB Qualifications within the Security Portfolio (v48 09-08-2021)*.

BIIAB Qualifications Limited must ensure that its providers' training, delivery and assessment for both the BIIAB Award for Door Supervisors in the Private Security Industry (Scotland) at SCQF level 6 qualification and BIIAB Award for Door Supervisors in the

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Private Security Industry Top Up qualification does not exceed eight hours a day, and that its providers complete detailed registers, signed daily by its learners.

This has been recorded as **Issue 5**.

Regulatory Principle 13. The awarding body and its providers must ensure that they have systems and processes which ensure the effective quality assurance of accredited qualifications.

On page 11 of the *Get Training Requirements for awarding organisations and training centres delivering SIA licence to practice qualifications. First published February 2021 | Last updated July 2023* under section 'Trainer / assessors delivering licence-linked qualifications' it states that 'all trainers and assessors must have achieved: A National Counter Terrorism Security Office (NaCTSO) / SIA endorsed counter terrorism programme such as the ACT (Action Counters Terrorism) Awareness and ACT Security training, which must be completed every year.'

Provider 1 gave the Accreditation Auditor an out-of-date ACT Awareness certificate dated 25 November 2021 and ACT Security certificate dated 31 March 2022 for its trainer / assessor.

On page 13 under the subject heading 'Occupational competence for approved trainers and assessors' it states that:

'Existing trainers and assessors must be able to demonstrate evidence of a suitable level of continued professional development (CPD) in their sector. This should include the equivalent of at least 40 hours every year spent in a combination of training, increasing professional knowledge through other means, or working in the industry. Suitable steps could include attendance at relevant conferences and seminars, and continuing work experience in the sector. This CPD record must show that a National Counter Terrorism Security Office (NaCTSO) / SIA-endorsed counter terrorism programme such as the ACT Awareness and ACT Security training has been completed on an annual basis.

'Training centres are responsible for keeping the CPD information of trainers and assessors. The SIA, and the awarding organisations, reserve the right to spot-check this information for accuracy and quality assurance (QA) purposes. This evidence must be kept for a minimum of three years for audit purposes.'

Both providers 1 and 2 were unable to provide the Accreditation Auditor with a CPD record for their trainer / assessor.

The Accreditation Auditor was unable to confirm compliance with requirements for trainers and assessors delivering licence-linked qualifications, as stipulated in the *Get Training Requirements for awarding organisations and training centres delivering SIA licence to practice qualifications. First published February 2021 | Last updated July 2023* for providers 1 and 2.

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BIIAB Qualifications Limited must ensure that its providers comply with the requirements for trainers and assessors delivering licence-linked qualifications, as stipulated in the *Get Training Requirements for awarding organisations and training centres delivering SIA licence to practice qualifications. First published February 2021 | Last updated July 2023.*

This has been recorded as **Issue 6**.

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

On page 38 of the *Centre Manual for the Administration of BIIAB Qualifications within the Security Portfolio (v48 09-08-2021)*, under section heading 'Centre Notification of Results' it states that: 'On the day of receipt of the complete examination documentation, BIIAB Qualifications Limited will mark the Answer Sheets and upload the examination results. The learner results will then become available to view in the "Results" section of Online Registration Certification and Assessment System (ORCAS).'

Provider 1 explained to the Accreditation Auditor that they had been experiencing delays with BIIAB Qualifications Limited resulting and certifying learners, and provided the Accreditation Auditor with email communication between BIIAB customer support and provider 1 that confirmed they had a learner who completed their multiple-choice exams for the BIIAB Award for Door Supervisors in the Private Security Top Up qualification in early November 2023. The secure white returns bag was posted first class with signature on delivery by the invigilator at the end of the day to BIIAB Qualifications Limited.

The provider contacted BIIAB customer support by email on three separate occasions in November 2023 requesting results for this learner. Provider 1 was informed that 'Due to the closure of the Farnborough office and transition of all paperwork and systems to the Nottingham office, we are dealing with difficulties in the processing of exam results/paperwork.'

However, BIIAB Qualifications Limited did not upload results for this learner until early December 2023 (approximately a month later).

On page 39 it states under section heading 'Learner certificates' that:

'Learner certificates are sent to the Centre Contact / Examination Officer the day after the next working day after examination results are released. BIIAB Qualifications Limited will issue both the overarching Qualification Certificate for the security portfolio, and a transcript of the units the learner has completed.'

The delay in resulting this learner by BIIAB Qualifications Limited resulted in their learner having to wait over a month to receive their qualification certificate which is a requirement by the SIA to continue working in the private security industry once their license has expired.

Therefore, BIIAB Qualifications Limited has not resulted or certificated this learner within the timescales stipulated in the *Centre Manual for the Administration of BIIAB Qualifications within the Security Portfolio*.

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BIIAB Qualifications Limited must ensure that it results and certificates its learners within the timescales stipulated in the *Centre Manual for the Administration of BIIAB Qualifications within the Security Portfolio*.

This has been recorded as **Issue 7**.

Regulatory Principle 9. The awarding body and its providers must maintain accurate documents, records and data.

Regulatory Principle 16. The awarding body and its providers must have open and transparent systems, policies and procedures to manage complaints.

On reviewing the complaints policy for providers 1 and 2, the Accreditation Auditor noted provider 1 does not inform learners of how and when they can escalate a complaint to the appropriate awarding body if they are still dissatisfied.

Provider 2 does not inform learners of how and when they can escalate a complaint to the appropriate awarding body, or to the appropriate regulator, if they are still dissatisfied.

BIIAB Qualifications Limited must ensure that its providers' complaints policies reference how and when its learners can escalate a complaint to the appropriate awarding body and appropriate regulator.

This has been recorded as **Issue 8**.

Regulatory Principle 9. The awarding body and its providers must maintain accurate documents, records and data.

Regulatory Principle 17. The awarding body and its providers must have clear, fair and equitable systems, policies and procedures to manage appeals.

The Accreditation Auditor reviewed the appeals policies for providers 1 and 2 and noted they do not make it clear that SQA Accreditation is unable to overturn assessment decisions or academic judgements.

BIIAB Qualifications Limited must ensure that its providers' appeals policies make it clear that SQA Accreditation is unable to overturn assessment decisions or academic judgements.

This has been recorded as **Issue 9**.

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Regulatory Principle 9. The awarding body and its providers must maintain accurate documents, records and data.

Regulatory Principle 18. The awarding body and its providers must ensure that it has safeguards to prevent and manage cases of malpractice and maladministration.

SQA Accreditation Regulatory Principles (2021) state under Regulatory Principle 18 that: 'the awarding body must inform SQA Accreditation when any actual or suspected cases of malpractice and/or maladministration are identified.'

On page 3 of BIIAB Qualifications Limited's *Malpractice and Maladministration Policy (V1.22–23)* under subject heading '4 Dealing with cases of suspected Malpractice' it states the following:

'4.1 Once a potential case of malpractice has been identified we will review the information available and determine one of the following courses of action:

- Take no further action;
- Ask the Centre's Quality Manager to investigate the alleged malpractice;
- Ask the Centre's Quality Manager to provide information that may provide evidence to support / refute the alleged malpractice;
- Consider whether the Regulators and other Awarding / Apprenticeship Assessment Organisations should be notified;
- Carry out a full investigation.'

On reviewing BIIAB Qualifications Limited's *Malpractice and Maladministration Policy (V1.22–23)* the Accreditation Auditor noted that it did not state that the awarding body must inform SQA Accreditation when any suspected cases of malpractice or maladministration are identified.

In addition, the malpractice and maladministration policy given to the Accreditation Auditor by provider 2 did not state that all suspected cases of malpractice and maladministration must be referred to the awarding body, so that these can then be reported to SQA Accreditation.

Provider 2 gave the accreditation auditor the internal quality assurance report completed in March 2023 for the BIIAB Award for Door Supervisors in the Private Security Industry (Scotland) at SCQF level 6 qualification delivered in February 2023 over six days.

On reviewing this report, the Accreditation Auditor noted that it had identified that all six learners who were sampled during the internal quality assurance process were reading from aids during the question-and-answer session for physical intervention. This is evident from their body language and confirmed by the reflection of a screen being visible on the glasses of two learners, along with their eye movements and robotic answers.

The provider's internal quality assurer (IQA) shared this report with both the provider's assessor and BIIAB's external quality assurer (EQA) via a shared link in March 2023.

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The provider confirmed that they had not recorded or reported this as suspected malpractice, therefore they had not complied with their own malpractice and maladministration policy.

In addition, provider 2 explained to the Accreditation Auditor that they had delivered the BIIAB Award for Door Supervisors in the Private Security Industry (Scotland) at SCQF level 6 qualification in February 2024. Having collected all examination documentation from learners and checked everything was accounted for, the invigilator placed all documentation into the secure white returns bag sent recorded delivery to BIIAB Qualifications Limited.

The provider went on to explain to the Accreditation Auditor that they had then been contacted by BIIAB Qualifications Limited in February 2024, as they had received in the secure white returns bag for this qualification from provider 2 a multiple-choice examination question paper with completed answers.

BIIAB Qualifications Limited's EQAs then arranged a Microsoft Teams meeting with the provider in March 2024, where the provider was shown a screenshot of the multiple-choice examination question paper with completed answers. The provider explained to the Accreditation Auditor that BIIAB Qualifications Limited suspected that maybe the multiple-choice question paper had been completed by either the invigilator or trainer for learners to copy answers from. No minutes of this meeting or any investigation report were given to the provider by BIIAB Qualifications Limited.

When questioned, by BIIAB Qualifications Limited's EQAs both the trainer and invigilator stated they were unaware of the multiple-choice examination question paper with completed answers. The four learners who had completed the qualification in February 2024 were also questioned by provider 2 and no one admitted to completing the answers on the multiple-choice question paper submitted to BIIAB Qualifications Limited.

Having reviewed SQA Accreditation malpractice and maladministration records, the Accreditation Auditor can confirm that BIIAB Qualifications Limited had not informed SQA Accreditation of both these instances of suspected malpractice by provider 2.

BIIAB Qualifications Limited must ensure that their providers' procedures have a route for reporting all cases of suspected malpractice to them so that these can be reported to SQA Accreditation, and that they inform SQA Accreditation when any actual or suspected cases of malpractice or maladministration are identified.

This has been recorded as **Issue 10**.

2.3 Recommendations

Regulatory Principle 5. The awarding body and its providers must provide clear information on their procedures, products and services and ensure that they are accurate and appropriate to accredited qualifications.

Regulatory Principle 9. The awarding body and its providers must maintain accurate documents, records and data.

Provider 1 gave the Accreditation Auditor with its joining information that is sent out to its learners undertaking the BIIAB Award for Door Supervisors in the Private Security Industry Top Up qualification. On reviewing the documentation, the Accreditation Auditor noted that it referred its learners to another provider's website for further published information.

BIIAB Qualifications Limited may wish to remind its EQAs to check that its providers are providing clear and accurate information in their joining information.

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

Regulatory Principle 6. The awarding body must continually review the effectiveness of its services, systems, policies and processes.

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

At the time of provider monitoring both providers 1 and 2 explained to the Accreditation Auditor that they were experiencing delays with BIIAB Qualifications Limited resulting learners, which then has an impact on resits and certification.

Both providers explained to the Accreditation Auditor that currently the process is for the provider to log into the ORCAS system to view their candidates' results. However, they do not receive any notifications or alerts from BIIAB Qualifications Limited of when learner results or certificates are available to download.

BIIAB Qualifications Limited may wish to consider notifying or alerting its providers when its learner results and certificates are available to download.

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

3 Acceptance of Provider Monitoring Findings