



Provider Monitoring Report

Highfield Qualifications

2 February 2024 to 5 April 2024

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1 Background

Five providers were remotely monitored between 2 February 2024 and 5 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

Highfield Qualifications provider monitoring dates: 2 February 2024 to 5 February 2024

Provider Monitoring Report approved by Accreditation Co-ordination Group on: 29 May 2024

Provider Monitoring Report to be signed by Highfield Qualifications: 10 July 2024

Action Plan to be emailed to regulation@sqa.org.uk by Highfield Qualifications 10 July 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 Highfield Qualifications 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, eight Issues have been recorded and three Recommendations have been noted.

Issue	Detail of Issue recorded	Risk rating
1. Principle 5	Highfield Qualifications must ensure that its providers have a register which confirms that all invigilators have received an induction to the role as well as the policies and procedures. The register must be signed by the invigilator to confirm that they have received this induction, as stipulated in the Qualification Specification Highfield Award for Door Supervisors in the Private Security Industry (Scotland) at SCQF level 6 (January 2024).	Low
2. Principles 5 and 9	The conflict of interest policies at Providers 1, 3 and 5 do not comply with Highfield Qualifications’ Conflict of Interest Policy. In addition, Provider 4 has had a conflict of interest occur in relation to a reasonable adjustment request from a dyslexic learner requesting a reader. The provider permitted the reasonable adjustment, allowing the learner’s mother to read exam questions out to her son who then circled the answer. The provider did not inform Highfield Qualifications of this conflict of interest so they did not have the opportunity to discuss the situation with the Provider to determine the best approach to handle it, as stipulated in Highfield Qualifications’ Conflicts of Interest Policy,	High

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	<p>therefore, Provider 4 has not complied with Highfield Qualification's Conflict of Interest Policy.</p> <p>Highfield Qualifications must ensure that its providers' conflict of interest policies comply with Highfield Qualifications' Conflict of Interest Policy, and ensure that if any conflicts of interest occur, its providers follow this policy.</p>	
3. Principle 9	Highfield Qualifications must review its provider's Data Protection policies to ensure they comply with current data protection legislation.	Low
4. Principles 9 and 13	Highfield Qualifications must ensure that its providers' training, delivery and assessment for the Highfield Award for Door Supervisors in the Private Security Industry (Scotland) at SCQF level 6 qualification does not exceed eight hours a day and that its providers complete detailed registers, signed daily by its learners as stipulated in the Qualification Specification Highfield Award for Door Supervisors in the Private Security Industry (Scotland) at SCQF level 6 (January 2024).	Medium
5. Principle 13	<p>The Accreditation Auditor was unable to confirm compliance with tutor/assessor requirements as stipulated in Qualification Specification Highfield Award for Door Supervisors in the Private Security Industry (Scotland) at SCQF level 6 (January 2024) for Providers 1, 3, 4 and 5.</p> <p>In addition, the Accreditation Auditor was unable to confirm compliance with internal quality assurance requirements as stipulated in Qualification Specification Highfield Award for Door Supervisors in the Private Security Industry (Scotland) at SCQF level 6 (January 2024) for both Providers 1 and 5.</p> <p>Highfield Qualifications must ensure that its providers comply with both tutor/assessor</p>	Medium

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	requirements and internal quality assurance requirements as stipulated in Qualification Specification Highfield Award for Door Supervisors in the Private Security Industry (Scotland) at SCQF level 6 (January 2024).	
6. Principles 9 and 14	<p>Provider 4 permitted a reasonable adjustment request from a dyslexic learner requesting a reader. The provider permitted the reasonable adjustment, allowing the learner's mother to read exam questions out to her son who then circled the answer. The provider did not complete a Reasonable Adjustment Form and submit it to Highfield Qualifications at the end of the assessment together with examination materials.</p> <p>Provider 4 did not document the request for a reasonable adjustment and rationale for audit purposes or record the reasonable adjustment permitted by the provider on the learner's assessment record.</p> <p>Highfield Qualifications must ensure that its providers are complying with Highfield Qualifications' Reasonable Adjustment Policy.</p> <p>In addition, Highfield Qualifications must review its providers' equal opportunities policies to ensure compliance with current legislation.</p> <p>Providers 1 and 3 do not have a special considerations policy.</p>	High
7. Principles 9 and 16	Highfield Qualifications 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
8. Principles 9 and 17	Highfield Qualifications must ensure that its providers' appeals policies make it clear that SQA Accreditation is unable to overturn assessment decisions or academic judgements.	Low

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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 7	Highfield Qualifications may wish to consider alerting their Regulation Manager at SQA Accreditation of any complaints, to aid in planning provider monitoring activity, so that we are aware of any complaints at a particular provider, prior to provider monitoring activity being completed.
2. Principle 12	Highfield Qualifications may wish to remind its providers of the importance of recording standardisation meetings, to allow for these to be distributed to providers' delivery, assessment and quality assurance teams.
3. Principle 17	Highfield Qualifications may wish to remind its providers that when referring to them in their policies and procedures, that they refer to them as 'Highfield Qualifications'.

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 Highfield Qualification'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 areas of good practice were noted by providers:

Provider 1 highlighted:

- ◆ help and support provided by Key Account Manager
- ◆ cost effective
- ◆ wide portfolio of qualifications

Provider 2 highlighted:

- ◆ communication received from awarding body is quick, simple and streamlined.

Provider 3 highlighted:

- ◆ Key Account Manager is really good at responding and providing advice quickly
- ◆ robust policy and procedures
- ◆ External Quality Support (EQS) quick in responding to any queries by provider
- ◆ EQS has excellent sector knowledge

Provider 4 highlighted:

- ◆ extremely robust processes and procedures
- ◆ supportiveness
- ◆ EQS helpful, knowledgeable and contactable
- ◆ reasonable target dates allocated for provider to close out any actions raised

Provider 5 highlighted:

- ◆ awarding body staff are approachable and prompt at coming back with information and advice
- ◆ have an extremely good working relationship and the support provided is outstanding
- ◆ advice and support provided by Key Account Manager has been very supportive and proactive

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 7 of Qualification Specification Highfield Award for Door Supervisors in the Private Security Industry (Scotland) at SCQF level 6, under the section 'Examination Venue Criteria' 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 Security Industry Authority (SIA) Licence to Practice Qualifications Quality Assurance Engagement, undertaken by Highfield Qualifications in August 2023, requested a copy of the centre invigilator training log or register that confirms training has been undertaken by invigilators and complies with the SIA requirements specified in 'GET Training'.

At the time of provider monitoring activity, Provider 1 did not have a register that confirmed that invigilators had received an induction to the role of invigilation and its policies and procedures.

Highfield Qualifications 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 Qualification Specification Highfield Award for Door Supervisors in the Private Security Industry (Scotland) at SCQF level 6 (January 2024).

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

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.

Conflict of interest policies for Providers 1, 3 and 5 do not reflect that all approved providers must inform Highfield Qualifications as soon as practicably possible in the event that a conflict of interest has occurred, or a situation has developed that could give rise to a conflict of interest. This is extremely important and would give Highfield Qualifications the opportunity to discuss the situation with its approved centre and

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determine the best approach, as stipulated in Highfield Qualifications' Conflict of Interest Policy, V3 January 2024.

Provider 4 has had a conflict of interest occur in relation to a reasonable adjustment request from a dyslexic learner requesting a reader. The provider permitted the reasonable adjustment, allowing the learner's mother to read exam questions out to her son who then circled the answer. The provider did not inform Highfield Qualifications of this conflict of interest so they did not have the opportunity to discuss the situation with the Provider to determine the best approach to handle it, as stipulated in Highfield Qualifications' Conflicts of Interest Policy, therefore, Provider 4 has not complied with Highfield Qualification's Conflict of Interest Policy.

In addition, the conflict of interest policy for Provider 4 includes an inaccurate reference to a competitor awarding body — the provider confirmed to the Accreditation Auditor that they are not an approved centre of this awarding body.

On page 5 of the policy, it states 'If a learner or staff member believes that a declaration of conflict of interest has not been managed correctly, they may raise a complaint in line with the Complaint's Policy. If the full complaints procedure has been exhausted and the issue remains unresolved in line with direction in the Complaints Policy, learners may refer their concern to The Education and Skills Funding Agency.' This is not a route of escalation available to learners undertaking SQA accredited qualifications or for Scottish Modern Apprenticeships.

On page 6 under the heading 'Data Protection' it inaccurately states that 'Information provided will be processed in accordance with data protection principles as set out in the General Data Protection Regulation (GDPR) 2018 and Data Protection Act 1998. Data will be processed only to ensure that staffs act in the best interest of the company.' This should refer to the UK GDPR and Data Protection Policy 2018, which, together, make up current data protection legislation in the UK.

Providers' 1, 3 and 5 conflict of interest policies do not comply with Highfield Qualifications' Conflict of Interest Policy, and Provider 4 has had a conflict of interest occur and did not comply with this policy.

Highfield Qualifications must ensure that its providers' conflict of interest policies comply with Highfield Qualifications' Conflict of Interest Policy and ensure if any instances of a conflict of interest occur, its providers follow this policy.

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

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

On reviewing the data protection policies given to the Accreditation Auditor by Provider's 1 and 2, the Accreditation Auditor noted that they make 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. Provider 4 inaccurately refers to 'GDPR' and not 'UK GDPR', which came into effect on 1 January 2021.

The data protection policies for Providers 1, 2 and 4 inaccurately refer to eight principles where there are currently seven UK GDPR key principles, which came into effect on 1 January 2021. In addition, Providers 2 and 4 both inaccurately refer to the Data Protection Policy 1998.

Highfield Qualifications must review its provider's Data Protection policies to ensure they comply with current data protection legislation.

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

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 10 of the Qualification Specification Highfield Award for Door Supervisors in the Private Security Industry (Scotland) at SCQF level 6 (January 2024), under the section 'Guidance on delivery' it states the following:

'If self-study is used, the SIA have stated that the training, delivery and assessment of this qualification must take place over a minimum of six days (44 hours) and each day of training, delivery and assessment must not exceed eight hours.

If self-study is not used for this qualification, then the course must be delivered over seven days (52 hours) and each day of training, delivery and assessment must not exceed eight hours.

Centres must retain detailed registers that include start/end/break times of training for each day and these 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 the retention of assessment evidence requirements.'

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Provider 5 confirmed that they were using self-study and the detailed registers provided to the Accreditation Auditor by Provider 5 confirmed that training, delivery and assessment of the Highfield Awards for Door Supervisors in the Private Security Industry (Scotland) at SCQF level 6 qualification delivered in November 2023 over six days. However, for three out of the six days of training, delivery and assessment had been recorded as taking place over eight and half hours.

Therefore, Provider 5 has not complied with Qualification Specification Highfield Award for Door Supervisors in the Private Security Industry (Scotland) at SCQF level 6 (January 2024) which states that if self-study is used, the SIA have stated that the training, delivery and assessment of this qualification must take place over a minimum of six days (44 hours) and each day of training, delivery and assessment must not exceed eight hours.

In addition, both Providers 1 and 3 gave the Accreditation Auditor completed, detailed registers for the Highfield Award for Door Supervisors in the Private Security Industry (Scotland) at SCQF level 6 qualification which included the start/end/break times for five out of the six days of training. The registers had been signed daily by the learners.

Provider 1 provided the Accreditation Auditor with detailed registers for the Highfield Award for Door Supervisors in the Private Security Industry (Scotland) at SCQF level 6 qualification delivered in October 2023 for five out of six days of training.

At the time of provider monitoring Provider 1 explained that they had not realised that they had to complete a detailed register for day six of training when exams were being undertaken.

The SIA Licence to Practice Qualifications Quality Assurance Engagement undertaken by Highfield Qualifications in August 2023 requested a copy of the attendance registers for all days of training on this course. Only five days of registers have been uploaded. The course should be six days in length.

Provider 3 provided the Accreditation Auditor with detailed registers for the Highfield Award for Door Supervisors in the Private Security Industry (Scotland) at SCQF level 6 qualification delivered in February 2024 for five out of six days of training.

Therefore, Providers 1, 3 and 5 have not complied with the Qualification Specification Highfield Award for Door Supervisor in the Private Security (Scotland) at SCQF level 6 (January 2024).

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Highfield Qualifications must ensure that its providers' training, delivery and assessment for the Highfield Award for Door Supervisors in the Private Security Industry (Scotland) at SCQF level 6 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 4**.

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.

The Qualification Specification Highfield Award for Door Supervisors in the Private Security Industry (Scotland) at SCQF level 6 (January 2024) under section 'Tutor/assessor requirements' states the following on page 16 under the subject heading 'NaCTSO counterterrorism programme':

'Tutors must also successfully complete a National Counter Terrorism Security Office (NaCTSO)/SIA-endorsed counterterrorism programme such as the ACT (Action Counters Terrorism) Awareness training and the ACT security e-learning module, both of which must be completed annually.'

On page 17 under the subject heading 'Sector competence':

'To ensure that tutors have the right occupational expertise, the SIA require that:

existing tutors/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 (Action Counters Terrorism) awareness training has been completed on an annual basis.

It is the responsibility of training centres to retain the CPD information of trainers and assessors. Highfield and the SIA reserve the right to spot check this information for accuracy and quality assurance (QA) purposes. This evidence must be retained for a minimum of three years for audit purposes.'

On page 18 under the subject heading 'Additional unit-specific requirements':

'Unit 4: Application of physical intervention skills in the private security industry

- ◆ A current certificate (updated annually) from an approved Level 3 programme provider which details that the trainer is authorised to deliver the skills in the approved Level 6 physical intervention programme. It is the responsibility of the

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trainer to submit this to the training centre for Highfield to check the authenticity of these on an annual basis.'

On reviewing CPD records for Providers 1 and 3, the Accreditation Auditor noted that four trainers from Provider 1, and two trainers from Provider 3, and one trainer from Provider 4 had not recorded in their CPD record that they had completed the National Counter Terrorism Security Office (NaCTSO)/SIA-endorsed counter terrorism programme such as the ACT (Action Counters Terrorism) awareness training on an annual basis.

CPD records given to the Accreditation Auditor by Provider 3 for its two trainers covered a six-month period. In addition, Providers 3 and 4's CPD records did not detail the hours of CPD activity completed by its trainers and Provider 5 did not provide a CPD record for its trainer.

The Accreditation Auditor was unable to confirm that CPD records given to the Accreditation Auditor by Providers 3, 4 and 5 had completed at least 40 hours a year spent in a combination of training, increasing professional knowledge through other means, or working in the industry.

Both Providers 1 and 3 did not provide the Accreditation Auditor with a copy of an annual certificate from an approved level 3 programme provider for one of their trainers.

Therefore, the Accreditation Auditor was unable to confirm compliance with tutor/assessor requirements as stipulated in Qualification Specification Highfield Award for Door Supervisors in the Private Security Industry (Scotland) at SCQF level 6 (January 2024) for Providers 1, 3, 4 and 5.

On page 18 under the subject heading 'Internal Quality Assurer (IQA) requirements' it states the following:

'All those seeking to undertake internal quality assurance activities for licence-linked qualifications must have achieved as a minimum one of the following (or equivalent). A sample of qualifications are listed below; however, this list is not exhaustive. If the qualification does not appear below, please contact Highfield Qualifications:

Internal quality assurer (IQA) to hold any of the following qualifications:

- ◆ Level 4 Award in Understanding the Internal Quality Assurance of Assessment Processes and Practices (RQF)
- ◆ Level 4 Award in the Internal Quality Assurance of Assessment Processes and Practices (RQF)
- ◆ Level 4 Certificate in Leading the Internal Quality Assurance of Assessment Process and Practices (RQF)

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- ◆ V1 Conduct Internal Quality Assurance of the Assessment Process
- ◆ D34 Internally Verify the Assessment Process
- ◆ L&D 11 Internal Quality Assurance

OR the following unit from an IQA qualification:

Unit 2/Unit 4 Understanding the principles and practices of internally assuring the quality of assessment.'

Both Providers 1 and 5 did not provide the Accreditation Auditor with a copy of their IQA's internal quality assurance certificate.

In addition, the Accreditation Auditor was unable to confirm compliance with internal quality assurance requirements as stipulated in Qualification Specification Highfield Award for Door Supervisors in the Private Security Industry (Scotland) at SCQF level 6 (January 2024) for both Providers 1 and 5.

Highfield Qualifications must ensure that its providers comply with both tutor/assessor requirements and internal quality assurance requirements as stipulated in Qualification Specification Highfield Award for Door Supervisors in the Private Security Industry (Scotland) at SCQF level 6 (January 2024).

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

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

Regulatory Principle 14. The awarding body and its providers must ensure that its qualifications and their delivery and assessment are fair, inclusive and accessible to learners.

Highfield Reasonable Adjustments Policy, V3 January 2024 states the following:

3.3.5 Once the appropriate adjustment has been identified, the centre must document the request and rationale for audit purposes.

3.3.7 If the Reasonable Adjustment is permitted at the discretion of the centre, the Reasonable Adjustment Form must be completed and submitted to Highfield at the end of the assessment together with the associated examination/assessment materials.

6.2 The reader/writer should not normally be the learner's course tutor/trainer. On no account should such a facilitator be a relative or friend of the learner or anyone with a vested interest in the outcome of the assessment.

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8.4 In circumstances where a Reasonable Adjustment has been permitted at the discretion of the centre, the Reasonable Adjustments must be recorded by your centre on the learner assessment records and made available to Highfield upon request.

8.5 Prior to awarding a Reasonable Adjustment, Centres must check the content of the qualification specification and/or contact Highfield to ensure the reasonable adjustment is permitted to be granted. On occasion, the reasonable adjustment may not be required due to externally regulatory requirements of the qualification (for example, SIA licence-linked (Security) qualifications).

8.12 If Centres have any queries, Highfield strongly advises they contact their Account/Employer Engagement Manager

At the time of the provider monitoring activity, Provider 4 informed the Accreditation Auditor that they had one dyslexic learner about a year and half ago who completed the Highfield Award in Door Supervisors in the Private Security Industry (Scotland) at SCQF level 6 qualification who had requested a reasonable adjustment for a reader. The learner only informed the provider on the day that paper-based exams were to be undertaken that they required a reader.

The Accreditation Auditor was informed by the provider that they were unable to remember the learner's name or the exact dates the course was undertaken.

The Accreditation Auditor is not clear how the provider had ensured that the learner was sufficient in reading (a pre-requisite to the course), as this learner required a reader to read exam questions out.

The provider explained that the learner undertook their paper-based exams in another room approved by Highfield Qualifications so as to not to disturb other learners. However, the one invigilator was then sitting in a doorway so that they could view both exam rooms.

The provider confirmed to the Accreditation Auditor that they did not document the request for a reasonable adjustment and rationale for audit purposes or record the reasonable adjustment permitted by the provider on the learner's assessment record.

Therefore, Provider 4 had not complied with Highfield Qualifications' Reasonable Adjustments Policy.

Highfield Qualifications must ensure that its providers are complying with Highfield Qualifications' Reasonable Adjustment Policy.

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In addition, the equal opportunities policy at Providers 1, 2 and 3 listed the protected characteristics in reference to the Equality Act (2010). However, The equal opportunities policy at Provider 1 omitted gender. The equal opportunities policy at Provider 2 omitted gender reassignment and pregnancy and maternity and the equal opportunities policy at Provider 3 omitted sex and pregnancy and maternity.

Providers 1 and 2 also included characteristics such as colour, national origin and ethnic origin or nationality; these are not protected characteristics listed in the Equality Act 2010, as it incorporates all of these into the protected characteristic of race.

On reviewing the equal opportunities policy at Provider 5, it was apparent that this policy was aimed at employees and job applicants, making no reference to learners,

Highfield Qualifications must review its providers' equal opportunities policies to ensure compliance with current legislation.

Providers 1 and 3 do not have a special considerations policy.

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

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

In addition, the Complaints Policy for Provider 1 asked its learners to forward details of the complaint to the provider's old address.

Highfield Qualifications 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 7**.

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.

Provider 2's appeals policy does not make it clear that SQA Accreditation is unable to overturn assessment decisions or academic judgements.

Highfield Qualifications must ensure that its provider's appeals policies make it clear that SQA Accreditation is unable to overturn assessment decisions or academic judgements.

This has been recorded as Issue 8.

2.3 Recommendations

Regulatory Principle 7. The awarding body must have an effective approach for communicating with its staff, stakeholders and SQA Accreditation.

At the time of the provider monitoring activity, Provider 5 provided the Accreditation Auditor with email communications confirming that Highfield Qualifications had received a complaint from a learner who made allegations about Provider 5. The allegations were investigated appropriately by Highfield Qualifications and no actions were raised against the provider.

It is not mandatory for awarding bodies to notify SQA Accreditation of complaints. However, it would be considered good practice if the awarding body alerted the Regulation Manager to complaints to aid SQA Accreditation in planning provider monitoring activity, so that we are aware of any complaints at a particular provider, prior to provider monitoring activity being completed.

Highfield Qualifications may wish to consider alerting their Regulation Manager at SQA Accreditation of any complaints, to aid in planning provider monitoring activity, so that they are aware of any complaints at a particular provider, prior to provider monitoring activity being completed.

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

Regulatory Principle 12. The awarding body and its providers must ensure that they have the necessary arrangements and resources required to manage and administer qualification delivery and assessment.

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On page 22 of the Tutor, Assessor and Internal Quality Assurance Support Pack, Highfield Award for Door Supervisors in the Private Security Industry (Scotland) at SCQF level 6 Qualification Number: R670 04 (Version 2.1 August 2023) under the section 'Standardisation activities' states that 'Standardisation activities are centred and used as a method of sharing good practice across the delivery, assessment and quality assurance of the qualification. These activities should be completed on a periodic basis and include members of the centre's delivery, assessment and quality assurance team. The IQA officer is key to this process as it is likely they will have sampled work across tutors/assessors and so be able to share positives from each team member.'

Provider 1 was unable to provide the Accreditation Auditor with minutes of standardisation meetings. The provider stated that they were carrying out standardisation meeting but these were not being recorded to distribute to providers' delivery, assessment and quality assurance team. The provider informed the Accreditation Auditor that they are planning to create an email thread to all staff for all its qualifications containing recordings of conversations during meetings and what is agreed.

Highfield Qualifications may wish to remind its providers of the importance of recording standardisation meetings, to allow for these to be distributed to providers' delivery, assessment and quality assurance teams.

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

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.

On reviewing the appeals policy for Provider 4, the Accreditation Auditor noted that it stated that 'The Awarding Organisation is Highfield Awarding Body for Compliance (HABC) and their appeals policy can be located on their website: www.highfieldabc.com. Alternatively, please speak to the HABC team on 0845 2260350.'

Highfield Qualifications may wish to remind its providers that when referring to them in their policies and procedures, that they should refer to them as Highfield Qualifications.

This has been noted as **Recommendation 3**.

3 Acceptance of Provider Monitoring Findings