



Provider Monitoring Report

Vocational Training Charitable Trust (VTCT)

22 May and 23 May 2024

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1 Background

Two providers were remotely monitored on 22 and 23 May 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

VTCT provider monitoring dates: 22 May and 23 May 2024

Provider Monitoring Report approved by
Accreditation Co-ordination Group on: 12 June 2024

Provider Monitoring Report to be signed by VTCT: 25 July 2024

Action Plan to be emailed
to regulation@sqa.org.uk by VTCT: 25 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 VTCT 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, seven Issues have been recorded and one Recommendation has been noted.

Issue	Detail of Issue recorded	Risk rating
1. Principle 9	The data protection documentation at provider 2 referenced General Data Protection Regulation (GDPR) but had not been updated to reference the UK GDPR or the Data Protection Act 2018.	Low
2. Principle 12	The Accreditation Auditor sampled a number of attendance lists for theory examinations in hairdressing, barbering and beauty at both providers. It was noted that none of those sampled had the box against the learners’ names ticked to indicate that learner identification had been checked by the invigilator, contravening VTCT requirements.	High
3. Principles 13 and 9	<p>Both providers had VTCT external quality assurance visits recently.</p> <p>Firstly, none of the external quality assurance reports at either provider raised any action against the fact that invigilators had omitted to record the learner identification check, as referenced in Issue 2.</p> <p>Secondly, all reports at both providers stated that the providers were compliant with VTCT requirements in respect of policies and procedures, which is not the case, as seen in Issues 1, 4, 5, 6 and 7.</p> <p>The <i>VTCT Centre Agreement, November 2022</i> and the <i>VTCT Centre Handbook, July 2023</i> state which policies and procedures are needed and give some detail of expected content. However, this information does not seem sufficiently detailed for external quality assurers and providers, in terms of the precise content that should be included in provider documents relevant to data protection, equality and diversity, complaints, appeals, malpractice and maladministration.</p>	High

4. Principles 14 and 9	The equality and diversity policy at provider 2 listed protected characteristics but missed gender reassignment, sex and pregnancy/maternity.	Low
5. Principles 16 and 9	<p>The complaints policy at provider 1 did not make it clear that complaints for VTCT qualifications can be escalated to SQA Accreditation as the regulator.</p> <p>The complaints procedure at provider 2 did not reference escalation of complaints to either the awarding body or SQA Accreditation as the qualification regulator.</p> <p>A similar Issue was raised in the Provider Monitoring Report of 2022–23.</p>	Medium
6. Principles 17 and 9	The appeals procedure at provider 2 mistakenly referenced escalation to the SQA awarding body as the regulator, instead of SQA Accreditation. It also failed to state that upon receiving an appeal, SQA Accreditation can only review the appeal to check that due process has been followed and cannot overturn assessment decisions.	Low
7. Principles 18 and 9	<p>Across both providers, the malpractice policies did not clearly define malpractice and maladministration and did not make it clear that any malpractice and maladministration for VTCT qualifications would be reported to the awarding body.</p> <p>A similar Issue was raised in the Provider Monitoring Report of 2022–23.</p>	Medium

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	<p>Firstly, the awarding body may wish to review the risk rating system in its external quality assurance reports to include a ‘medium’ risk option, thereby incorporating a more staged, incremental approach.</p> <p>Secondly, VTCT may wish to explore ways of making Pivot Point equally accessible to all its providers in terms of cost.</p>

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 VTCT'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

Staff at both providers spoke extremely favourably of VTCT as an awarding body. Specifically, the following areas of good practice were noted by providers.

Provider 1 highlighted the:

- ◆ positive relationship with the external quality assurers, who are extremely supportive
- ◆ very constructive feedback from external quality assurers in the different sectors in which the provider operates
- ◆ co-ordination of external quality assurers across sectors facilitating visits in a timely and standardised manner
- ◆ responsive and innovative nature of VTCT, especially in the development of new qualifications
- ◆ quick resolution of any queries
- ◆ interactive relationship with sales staff at VTCT, who are extremely accommodating and receptive and who have facilitated different initiatives at the provider
- ◆ flexibility of the curriculum and facility for registration per unit
- ◆ VTCT roadshow events in Edinburgh and Fife
- ◆ continuing professional development event funded by VTCT at the provider, which was open to other providers in the sector, featuring guest presentations from Wella and Hair Has No Gender
- ◆ development of video-based learning materials for Afro-Caribbean hair, which are cost effective for the provider and highly informative for learners

Provider 2 highlighted the:

- ◆ quick resolution of queries
- ◆ inclusive nature of VTCT, who are welcoming to new provider staff
- ◆ the encouraging manner of VTCT staff, who acknowledge provider success
- ◆ collective continuing professional development events both in person and remotely
- ◆ positive relationship with the external quality assurer, who is accessible and available to provider staff when required
- ◆ helpful feedback from the external quality assurer

2.2 Issues

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

The data protection documentation at provider 2 referenced GDPR but had not been updated to reference the UK GDPR or the Data Protection Act 2018.

This has been recorded as **Issue 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.

In relation to conducting theory examinations for VTCT qualifications, section 4.2.1, page 11 of the *VTCT Instructions for Conducting Examinations, March 2024* states that, 'before learners are allowed to start the examination the invigilator must always confirm the identity of the learners in line with centre requirements for this purpose, usually photographic ID, and record verification on the attendance list.'

The Accreditation Auditor sampled a number of attendance lists for theory examinations in hairdressing, barbering and beauty at both providers. None of the lists sampled had the box against the learners' names ticked to indicate that identification had been checked by the invigilator. Staff at both providers commented that this had been an oversight and acknowledged it needed to be corrected in future.

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

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.

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

Both providers had VTCT external quality assurance visits recently across hairdressing, barbering and beauty sectors. These visits are conducted on a risk basis and are generally undertaken annually.

Firstly, none of the external quality assurance reports at either provider raised any action against the fact that invigilators had omitted to record the learner identification check, as referenced in Issue 2. An action was raised about the start and finish times for examinations not being recorded on the invigilation report in one of the providers, but the omission of identification check recording was not raised.

Secondly, within the external quality assurance reports, section 2 covering management, systems and resources has a question against 2.6: 'does the centre have policies and procedures in place to ensure it meets all requirements and obligations, as defined in the VTCT centre agreement?'. All reports at both providers stated that the providers were compliant with VTCT requirements in respect of policies and procedures, which is not the case, as seen in Issues 1, 4, 5, 6 and 7.

The *VTCT Centre Agreement, November 2022* and the *VTCT Centre Handbook, July 2023* state which policies and procedures are needed and give some detail of expected content. However, this information does not seem sufficiently detailed for external quality assurers and providers, in terms of the precise content that should be included in provider documents relevant to data protection, equality and diversity, complaints, appeals, malpractice and maladministration.

Additionally, provider 2 had been the subject of provider monitoring in 2018–19, and all policies and procedures were correct at that time, highlighting how important it is for external quality assurers to check documentation frequently to ensure ongoing compliance.

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

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.

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

The equality and diversity policy at provider 2 listed protected characteristics but missed gender reassignment, sex and pregnancy/maternity.

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

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

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

The complaints policy at provider 1 made reference to escalation of complaints to the qualification regulator but gave details of another qualification regulator, not SQA Accreditation. Specific and detailed reference to SQA Accreditation was made for other awarding bodies associated with the provider but not for VTCT. The complaints policy needs to make it clear that complaints for VTCT qualifications can be escalated to SQA Accreditation as the regulator.

The complaints procedure at provider 2 did not reference escalation of complaints to either the awarding body or SQA Accreditation as the qualification regulator.

A similar Issue was raised in the Provider Monitoring Report of 2022–23.

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

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

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

The appeals procedure at provider 2 mistakenly referenced escalation to the SQA awarding body as the regulator, instead of SQA Accreditation. It also failed to state that upon receiving an appeal, SQA Accreditation can only review the appeal to check that due process has been followed and cannot overturn assessment decisions.

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

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

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

The malpractice policy and procedure at provider 1 was mainly worded in reference to other awarding bodies and did not make it clear that any malpractice and maladministration for VTCT qualifications would be reported to the awarding body.

The malpractice policy at provider 2 had confused the definition of malpractice by including terms such as 'accidental' that are pertinent to maladministration. It did not make it clear that any maladministration for VTCT qualifications would be reported to the awarding body. It also had wording taken from an old version of the *VTCT Centre Handbook 2014*.

A similar Issue was raised in the Provider Monitoring Report of 2022–23.

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

2.3 Recommendations

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

Firstly, the Accreditation Auditor noted that the VTCT external quality assurance report lists each criterion within every section and has a corresponding risk rating of 'very low', 'low', 'high' and 'very high' to be selected for each one.

The awarding body may wish to review this risk rating system to include a 'medium' risk option, thereby incorporating a more staged, incremental approach.

Secondly, provider 2 commented that VTCT produces Pivot Point, which is an excellent online resource, but it is too costly to them as a small provider.

VTCT may wish to explore ways of making Pivot Point equally accessible to all its providers in terms of cost.

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

3 Acceptance of Provider Monitoring Findings