

Using online and remote technology for delivery, assessment and quality assurance:

Guidance to awarding bodies

An Assurance of Quality

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1 Introduction

Awarding bodies are increasingly using alternative solutions and adaptations to enable them to offer online and remote models of delivery, assessment and quality assurance techniques.

SQA Accreditation's Regulatory Principles support awarding bodies that embrace new forms of digital technology. The Principles also provide a framework that allows awarding bodies to offer innovative means to provide online or remote platforms for qualification delivery, assessment and quality assurance.

1.1 Who is this guidance for?

This guidance applies to approved awarding bodies offering qualifications regulated by SQA Accreditation. It is intended to assist awarding bodies that are using online technology, but awarding bodies must also share the guidance with their providers and with any third parties to whom they have devolved responsibility for any aspects of online or remote delivery, assessment and quality assurance.

It will not be possible to cover all the uses and types of technology here. Rather, the guidance provides an overview for awarding bodies and encourages them to think about the bigger picture and the impact that new technology is likely to have on many aspects of their business operations.

1.2 What types of qualifications is the guidance for?

The guidance applies all types of qualifications accredited by SQA Accreditation.

1.3 Ownership and accountability

Awarding bodies may already operate their own online or remote systems, but may also choose to use the services of one or more third parties. There are many third parties offering online solutions and remote platforms to provide environments where qualifications can be assessed, delivered and quality assured. However, **it is the responsibility of the awarding body, not of the third parties**, to provide evidence of how they comply with the Regulatory Principles, (see 2.2 for further information).

Where a third party performs any aspect of online or remote delivery, assessment or quality assurance, SQA Accreditation must be provided with evidence from the awarding body that shows how they meet our regulatory requirements.

2 Guidance information and general requirements

Guidance issued by awarding bodies or third parties to providers, learners and users of the technology should:

- ◆ describe how the online or remote models of delivery, assessment and quality assurance will operate
- ◆ explain any rules and regulations
- ◆ outline any terms and conditions that providers and learners are required to consent to

All guidance on their procedures, products and services should be accurate and appropriate to SQA accredited qualifications.

In addition, awarding bodies or third parties must specify:

- ◆ any minimum hardware or software specifications for online assessments
- ◆ acceptable electronic file formats for recording assessment evidence, fee and refund processes
- ◆ any other information that providers, learners or users of technologies should be aware of

For online assessments, these things must be clear:

- ◆ how a provider or learner books an assessment
- ◆ how they pay fees or get refunds
- ◆ what is expected of them prior to, during and after assessment
- ◆ how and when they will receive their results
- ◆ who they can complain to should they need to

2.1 Third parties, contracts and agreements

SQA Accreditation defines a third party or service provider as *'any person(s) or organisation(s) with whom an awarding body contracts to deliver services on behalf of the awarding body'*.

Awarding bodies are required to demonstrate how they manage third parties. They must have relevant and current legal and/or contractual agreements in place that define which party or parties execute specific procedures and processes for online or remote delivery, assessment or quality assurance.

Regardless of who does what, **it is the responsibility of the awarding body to provide evidence of how they comply with the Regulatory Principles**, not the third parties.

Where a third party performs any aspect of delivery, assessment or quality assurance of qualifications regulated by SQA Accreditation, we may require evidence from an awarding body that shows how its third party performs particular functions on its behalf.

Our right to access systems, information, data and records only applies **where this is in relation to qualifications regulated by SQA Accreditation so that we can fulfil our regulatory requirements**. It is therefore the awarding body's responsibility to ensure that their third parties are aware of any relevant requirements of the Accreditation Licence, the Regulatory Principles and Regulatory Principles Directives.

Under certain circumstances it may be more effective for SQA Accreditation to liaise directly with a third party, by agreement or in conjunction with the awarding body. However, accountability for compliance remains solely with the awarding body as the contracted licensee with SQA Accreditation.

Legal and/or contractual agreements with third parties must specify operating responsibilities between parties. These should include, but are not limited to:

- ◆ service delivery agreements
- ◆ frequency of review meetings
- ◆ data security, data storage, data access, data retention and data disposal (see 2.3 for further information)

Legal and/or contractual agreements should also make it explicit that third parties will be required to provide access to systems, information, data and records in relation to qualifications regulated by SQA Accreditation.

Similarly, awarding bodies' legal and/or contractual agreements with providers, and between providers and learners, for online and remote delivery, assessment or quality assurance activities, should also reflect any specific responsibilities, including the role of SQA Accreditation.

Learner agreements or terms and conditions which require consent prior to taking online assessments must indicate that learners' information and records may be shared with SQA Accreditation so that it can perform its regulatory functions.

Where awarding bodies use the services of a third party, they must also ensure that they have appropriate access to the data and records they need to carry out their own internal and external quality assurance activities so that they can confirm that legal and/or contractual agreement obligations with a third party are being fulfilled.

Business software platforms such as Microsoft Teams, Zoom, Skype, Dropbox etc do not constitute third-party services unless the awarding body has entered into contract for the software developer to provide enhanced or additional functionality which does not form part of a basic license or terms and conditions.

2.2 Services, systems, policies and processes

Awarding bodies should continually review the effectiveness of the services, systems, policies and processes which are affected or impacted by the use of online or remote models of delivery, assessment and quality assurance.

In addition to the regular review of services and systems, some examples of policies and processes that awarding bodies may wish to review are suggested below, however, this is not an exhaustive list.

- ◆ malpractice and maladministration processes and guidance
- ◆ complaints and appeals processes and guidance
- ◆ data storage and security policies
- ◆ data retention and disposal policies
- ◆ equality and equal opportunity policies
- ◆ reasonable adjustments and special consideration policies
- ◆ business continuity, resilience, conflict of interest and risk policies

2.3 Data security, storage, access, retention and disposal

The growth and use of technology inevitably means an increase in the volume of digital information and data that is generated and requires storage. The security of the personal data of individuals is of paramount importance and may mean that awarding bodies are required to review their data protection and/or privacy policies. It must be clear from contractual agreements who is the controller and processor of information. SQA Accreditation must be notified of any changes to controller/processor arrangements.

Awarding bodies will be required to ensure they have protocols in place for the safe storage, access, transfer, retention and disposal of information, and should comply with the relevant data protection legislation and information security standards for information management.

Awarding bodies should also determine whether their contingency, business resilience and risk measures are adequate and robust in the event that a third party's platform is unable to provide services that are stable, secure and reliable or fit for purpose. They should also consider the risk of a third party going out of business.

Awarding bodies should define the types and formats of electronic records they hold or require access to for delivery, assessment and quality assurance purposes. In addition, they should specify what personal information and consents they need to hold.

3 Assessment procedures

Awarding bodies must always follow the specific qualification assessment strategies and methodologies approved by SQA Accreditation that specify requirements for delivery, assessment and quality assurance.

Any alternative approaches to assessment other than those approved at the time of accreditation must be submitted to SQA Accreditation for approval. We will consider if the changes have any adverse effects on validity, reliability, comparability or bias.

3.1 Learner identification and authentication

For any form of online or remote assessment, the identity of the learner must be authenticated by the awarding body or by the third party acting on behalf of the awarding body.

Where it exists, awarding bodies should follow guidance that has qualification or industry specific requirements. Where the awarding body has designed and developed its own qualifications, it may choose to specify which forms of legal learner identification are acceptable based on factors such as the type of assessment, conditions of assessment and assessment risk.

Evidence of how learners' identity is authenticated should be captured and kept for quality assurance and regulatory purposes. For instance, has it been established on video prior to a remote assessment, or has it been verified by an invigilator prior to a remotely invigilated examination? It is also important that, even where the learner is known to the assessor or examiner, procedures to check identity are still carried out and recorded. Additional information such as the time, date, location and personnel involved in the assessment should also be captured.

Where coursework, open book assessments, assignments or essays are submitted online, awarding bodies are encouraged to use anti-plagiarism software and adopt enhanced quality assurance procedures to ensure that the work submitted by learners is their own and makes proper reference to source material.

3.2 Pre-assessment checks

Many of the pre-assessment checks can be set out in guidance by the awarding body so that providers and learners are clear of the requirements. These could include:

- ◆ how a learner's consent will be obtained prior to assessment
- ◆ how a learner's identification will be authenticated prior to assessment
- ◆ reminding a learner that their assessment may be recorded and shared
- ◆ conditions of the assessment including permitted or prohibited items
- ◆ actions which may constitute malpractice
- ◆ how reasonable adjustments or special arrangements will be applied
- ◆ robust contingency processes for assessment interruption
- ◆ how the functions of a learner's computer may be restricted during assessment

4 Models of online and remote assessment

SQA Accreditation has defined various terms for online and remote assessment, including remote invigilation (also sometimes referred to as online or remote proctoring). A full list of terms and definitions can be found on SQA Accreditation's website. SQA Accreditation has collaborated with other UK Qualifications Regulators to align these closely where possible.

Aspects of the models of assessment outlined in 4.1 – 4.3 may be blended or overlap. They may also include other features not covered by this guidance. Awarding bodies should not be concerned with fitting exactly into one category, but instead on finding an approach or combination of approaches that suits their qualifications and meets the scope of the assessment procedures outlined in section 3. Where the services of a third party are used, the awarding body should define and document the roles and responsibilities of those involved.

The use of online assessment is also appropriate for items such as coursework, open book assessments, assignments and essays, but to a lesser extent as the submission of the assessment item tends to be the only online activity that the learner is exposed to. These types of assessment items tend to be marked by examiners and are normally subject to marker review and quality checks prior to the release of results.

4.1 Online assessment

In this guidance we use the term 'online assessment'. You might also see it referred to as 'e-assessment' or 'computer-based assessment'.

Some features of online assessment are:

- ◆ the assessment is normally a test or examination facilitated by information technology
- ◆ the assessment can be taken locally, nationally or internationally
- ◆ the assessment is normally undertaken under controlled or supervised conditions

Typical uses of online assessments are for examinations or test delivery at an approved provider's venue, or a venue approved by the awarding body. The assessment would normally be available to a group of learners who have booked in advance, and is delivered under controlled or supervised conditions.

This type of assessment lends itself to standard sittings or session-based examinations where the awarding body runs scheduled assessments throughout the year, but they also work well for on-demand examinations which can be run at short notice.

4.2 Remote assessment

Some features of remote assessment are:

- ◆ the learner and assessor/examiner are in different locations to each other
- ◆ the assessment is facilitated by information technology
- ◆ the assessment can be observed live and recorded
- ◆ the assessment can be blended with other assessment approaches (eg aspects of online, e-or computer-based assessment)

Remote assessment is particularly useful for performance and competence based qualifications where the most effective way of assessing is by observing the learner directly. Live assessment allows for instant feedback and questioning where appropriate, however, recorded assessment allows for review and assessment later.

Remote assessment can be used to capture live and/or recorded video evidence of practical activities being carried out. Using this method, the learner and assessor/examiner can be in different locations, and assessment can be in real time or video evidence can be assessed using a 'record and review' approach.

Where the learner and assessor/examiner are in the same location using video to record and assess practical activities, this is not remote assessment. This is still a valid assessment evidence, but it is merely a recorded observation as both the learner and assessor/examiner are not remote.

4.3 Remote invigilation

Remote invigilation, or 'remote proctoring' as it is sometimes called, is a solution to taking an assessment at the learner's chosen location — for instance at their own home or place of work, or a place where standard invigilation procedures cannot be applied.

This technique blends aspects of both online and remote assessment, but it is important to note that the invigilator plays no part in assessing the learner — they merely observe the learner throughout the online assessment. Under some circumstances it may be necessary for the invigilator to intervene, provide guidance or provide technical support to the learner.

Some features of remote invigilation are:

- ◆ live and/or automated supervision of a learner completing a required assessment task in a different location to that of the invigilator
- ◆ the learner completes the assessment under specified conditions so that the awarding body can assure itself of the validity of the assessment and secure the award of the qualification
- ◆ assessments are recorded for review and quality assurance purposes
- ◆ software used is often supplied by a third party other than the awarding body
- ◆ the invigilator is not assessing the learner

Where the awarding body uses third party services for remote invigilation, all parties should be familiar with their obligations under section 2.1. Awarding bodies should ensure that they

still perform the necessary quality assurance activities to check that assessment is being conducted in line with published guidance and procedures.

Given the remote nature of this approach and the fact that the invigilator will not know the learner, it is important that learner identification is validated and that a 360-degree scan of the learner's assessment environment is carried out. The learner should be made aware of what they can and cannot do during the assessment — for instance, whether they can take comfort breaks, what to do in the event of IT difficulties, or whether they can use a mobile phone or calculator. This should be clearly outlined by the awarding body in advance via assessment guidance.

Awarding bodies should ensure that invigilators or those involved in pre-assessment checks:

- ◆ have had the necessary training to manage and adhere to defined assessment procedures
- ◆ are familiar with the technology itself
- ◆ are properly equipped to handle IT issues or manage suspected cases of malpractice during the assessment

5 Online and remote assessment results

Awarding bodies should ensure that learners are clear how and when they will receive their results. There is no standard approach or requirement for the release of results. For some models of online and remote assessment (where it is computer marked) this can be instantaneous. Results can also be issued as provisional subject to review or verbal subject to moderation/verification.

6 Online and remote delivery

Online and remote delivery (sometimes referred to as e-learning/e-delivery) is a means by which providers can deliver teaching and learning opportunities. It can also provide opportunity for assessment.

Some features of online and remote delivery are:

- ◆ learning and teaching is facilitated by information technology
- ◆ availability of many free or basic licence platforms
- ◆ opportunities for formative and summative assessment
- ◆ variety of formats such as lectures, webinars, workshops or interactive activities
- ◆ commonly used by providers for distance learning
- ◆ the ability to reach groups and individuals remotely

7 Online and remote quality assurance

As an alternative to face-to-face visits, awarding bodies may choose to carry out their quality assurance activities online. For the purposes of this guidance online and remote quality assurance can also refer to internal and external based quality assurance activities including moderation, verification, inspection and monitoring.

Awarding bodies must always follow the specific qualification assessment strategies and methodologies approved by SQA Accreditation that specify requirements for delivery, assessment and quality assurance.

Any alternative approaches to assessment other than those approved at the time of accreditation must be submitted to SQA Accreditation for approval. We will consider if the changes have any adverse effects on validity, reliability, comparability or bias.

Some features of remote quality assurance include:

- ◆ the monitoring, moderation or verification of activities to confirm quality requirements are being met via the use of technology
- ◆ cost effective and time saving for two or more parties in different locations to each other
- ◆ meetings are no longer physical and can take place virtually
- ◆ decisions and outcomes are evidence based
- ◆ activities are normally two-way and interactive, and allow for discussion
- ◆ activities allow for verbal/provisional feedback or post-activity follow-up

8 Malpractice

Awarding bodies should ensure that existing malpractice policies are updated to take account of the impact that technology may have on processes and procedures. Where an awarding body uses the services of a third party, policies, processes and procedures must clearly outline roles, responsibilities and lines of demarcation when dealing with cases of suspected or actual malpractice.

Awarding bodies may also wish to look to features of technology that have been designed to cut down or reduce the risk of actual or potential malpractice. Where assessment is remote it may be more challenging for an invigilator to spot malpractice, and it may not always be the most appropriate action to interrupt an assessment even if malpractice is suspected.

Online and remote assessment allows for the review of video evidence and in some cases where artificial intelligence is a feature of the software, post-assessment logs can be reviewed where timestamped activities or suspected malpractice have been identified. This allows the awarding body to be more directly involved in cases of online or remote malpractice.

For guidance on reporting and managing cases of suspected or actual malpractice, see https://accreditation.sqa.org.uk/accreditation/Regulation/Regulatory_Principles_Guidance_Notes.

9 Complaints and appeals

Awarding bodies should ensure that existing complaints and appeals policies are updated to take account of the impact that technology may have on processes and procedures. Where an awarding body uses the services of a third party, policies, processes and procedures must clearly outline roles, responsibilities and lines of demarcation when dealing with complaints and appeals.

Awarding body and provider guidance to learners must be clear and accurate in relation to how and when they can complain to SQA Accreditation regarding delivery, assessment and quality assurance matters which have involved online technology and where appropriate the Scottish Public Services Ombudsman (SPSO).

10 Additional guidance and support from SQA Accreditation

It is not possible to cover all the individual nuances that can arise when using online and remote forms of technology for delivery, assessment and quality assurance as these will vary significantly from awarding body to awarding body.

If you require further information or clarification on specific matters, please contact your appointed Regulation Manager or Accreditation Manager.