

Risk-Based Approach to Site Quality Monitoring Policy and Procedure

1. Scope

1.01 This policy and procedure outlines University Of Applied Research & Development's risk-based approach to its monitoring of approved Sites¹. It extends to all areas where University Of Applied Research & Development, or Delivery Partner, has granted approval for a Site to deliver:

- a) Regulated qualifications under the various conditions and regulations set by the UK regulatory authorities in England, Northern Ireland and Wales². This includes all qualifications included in the SASE apprenticeship frameworks.
- b) Non-regulated provision, including Endorsed Programmes.
- c) Reformed Apprenticeships in England.

1.02 The intended audience for this document is:

- a) University Of Applied Research & Development Directors and Board of Trustees.
- b) University Of Applied Research & Development core, sub-contracted and associate staff, including External Quality Assurers (EQAs).
- c) All staff of University Of Applied Research & Development Delivery Partners associated with University Of Applied Research & Development provision.
- d) All staff in University Of Applied Research & Development recognised and partner Sites.
- e) Qualification Regulators.
- f) Industry Regulators.

2. Purpose

2.01 The purpose of this document is to:

- a) Ensure that the standard of delivery of University Of Applied Research & Development qualifications consistently meets all regulatory requirements.
- b) Outline how University Of Applied Research & Development will monitor the delivery of University Of Applied Research & Development products within its approved Sites.
- c) Minimise any risks to the integrity of University Of Applied Research & Development qualifications.
- d) Outline to Sites what action University Of Applied Research & Development will take where it finds that the management or quality assurance standards of a Site do not meet University Of Applied Research & Development or regulatory requirements, including the use of a tariff of Sanctions.

2.02 Sites must demonstrate that they have the required systems, expertise, resources, policies and procedures in place to effectively manage the assessment and internal quality assurance of its University Of Applied Research & Development provision.

¹ This includes Sites of University Of Applied Research & Development's **recognised** Delivery Partners.

² Ofqual in England; Qualification Wales; CCEA Regulation in Northern Ireland or successor bodies.

- 2.03 To retain Site Approval status, Sites must consistently meet University Of Applied Research & Development's published Approval Criteria as outlined in the University Of Applied Research & Development Quality Assurance Manual. Sites must also comply with University Of Applied Research & Development's Site Agreement and Terms and Conditions.
- 2.04 By signing University Of Applied Research & Development's Site Agreement and Terms and Conditions, Sites agree to comply with all University Of Applied Research & Development requirements, including the monitoring activities outlined in this policy.

3. Policy

- 3.01 University Of Applied Research & Development is committed to having a transparent, fair, robust and risk-based approach to the External Quality Assurance of its approved Sites. Sites are monitored against their ability to meet University Of Applied Research & Development's Approval Criteria and compliance with University Of Applied Research & Development's Site Agreement and Terms and Conditions.
- 3.02 The monitoring of University Of Applied Research & Development Sites is managed by the Quality Assurance Team, in conjunction with the Site's assigned EQA.
- 3.03 University Of Applied Research & Development will undertake both routine and, where appropriate, additional monitoring of Sites, as well as investigation into Site activity. University Of Applied Research & Development will review a Site's level of compliance through:
- a) Ongoing External Quality Assurance including that of regulated qualifications, non-regulated provision and apprenticeships.
 - b) Responding to information received from the Regulators and/or other external bodies, including regarding malpractice and maladministration.
 - c) Responding to external feedback and/or complaints received from learners, Site staff, whistle-blowers, other Awarding Organisations, members of the public or the media.
 - d) Investigation into suspected or proven malpractice as defined in University Of Applied Research & Development's Malpractice and Maladministration Policy and Procedure.
 - e) Monitoring of the management of administration associated with University Of Applied Research & Development provision.
 - f) Monitoring payment of invoices.

Routine Monitoring

- 3.04 All University Of Applied Research & Development Sites will receive at least one Site-based External Quality Assurance activity per academic year. Sites will also receive one remote sampling activity (if the Site's throughput allows this).
- 3.05 During monitoring activities, the EQA will conduct External Quality Assurance of learner's work or assessment activity, as well as reviewing the Site's administration and management systems, resources, assessment and internal quality assurance system against University Of Applied Research & Development's Approval Criteria (as outlined in the University Of Applied Research & Development Quality Assurance Manual).
- 3.06 The EQA will use their findings from the monitoring activity to make judgements about the Site's level of risk in the below five key 'risk areas':

- a) Internal Management and Systems.
- b) Resources, Equipment and Staff.
- c) Internal Assessment and Training.
- d) Internal Quality Assurance.
- e) External Assessment Arrangements (where applicable).

3.07 Based on all available evidence, the EQA will assign the Site a risk rating of either Low, Moderate or High in each of the five areas. The risk rating applied will be based on the EQA's judgement of how successful the Site are in meeting University Of Applied Research & Development's Approval Criteria in that area. Sites who successfully demonstrate their ability to consistently meet the criteria will be assigned a low risk rating. Conversely, where Sites do not meet University Of Applied Research & Development's Approval Criteria, or where improvements are required, Sites will be assigned a moderate or high rating, dependent on how severe the non-compliance is deemed to be.

3.08 The failure to address previously identified actions required to meet or strengthen compliance with the Approval Criteria may result in an escalation of the risk level assigned and an increase in the monitoring activity employed.

3.09 The highest level of risk identified across the five 'risk areas' will inform the overall risk rating assigned to the Site. University Of Applied Research & Development's approach to the monitoring of a Site is driven by this overall risk rating. The level of risk that is applied to the Site following a monitoring activity will determine when the Site's next **routine monitoring** activity will take place.

3.10 Where immediate risk to the integrity of University Of Applied Research & Development qualifications or to the interests of learners is identified, the EQA may recommend a Sanction against a Site. Any Sanctions recommended will be proportionate to the risk identified and range from levels 1 to 5, increasing in severity. Dependent on their level, the application of a Sanction may affect the Site's registration, certification or Direct Claims Status rights. The application of a Sanction may also trigger **additional monitoring** for corrective action by the Site to be reviewed by the EQA. University Of Applied Research & Development's full list of Sanctions are detailed in 5.07.

3.11 University Of Applied Research & Development's risk ratings, with their corresponding indicative Sanction level and future monitoring activity, are detailed below:

Risk Rating	Risk Descriptor	Indicative Sanction Level	Next Monitoring Activity
Low	Site successfully meets Approval Criteria and regulatory conditions, or any remedial actions required to meet requirements are minor. The Site does not pose a risk to University Of Applied Research & Development qualifications or to learners.	None to Level 1	Within 12 months

Moderate	Site does not meet all Approval Criteria and/or regulatory conditions and there are concerns with regards to the risk to learners and/or the integrity of University Of Applied Research & Development qualifications. Significant action is required.	Level 2	Within 6 months
High	Site does not meet Approval Criteria and/or regulatory conditions and there are major concerns with regards to the risk to learners and/or the integrity of University Of Applied Research & Development qualifications. Urgent and significant action is required.	Level 3 and Above	Within 3 months

- 3.12 If a Site is rated as moderate or high risk and additional monitoring is required, the Site may be charged for any additional visits or sampling that they receive, as detailed in University Of Applied Research & Development's Tariff, which is available on the University Of Applied Research & Development website.
- 3.13 As well as determining when the Site will next receive monitoring, a Site's risk rating will also be considered by University Of Applied Research & Development when it makes both quality assurance and financial decisions, including those on additional qualification approval, approval of Direct Claims Status (DCS) and payment terms.

Additional Monitoring

- 3.14 University Of Applied Research & Development may undertake additional monitoring of a Site in addition to its level of routine monitoring from its assigned risk rating. University Of Applied Research & Development reserves the right to undertake additional monitoring of a Site at any time. This may be due to, but is not limited to:
- a) The size and structure of the Site.
 - b) The subject sector areas under focus by University Of Applied Research & Development.
 - c) Whether the Site has Direct Claims Status (DCS).
 - d) High volume of registrations and/or certifications.
 - e) Non-payment or late payment of invoices.
 - f) Information provided by internal stakeholders.
 - g) Intelligence received externally by University Of Applied Research & Development.
- 3.15 University Of Applied Research & Development may conduct both announced and unannounced additional visits to Sites at any time. Sites are required to allow access to their premises, records, learners and staff for the purposes of monitoring without notice when requested to do so by University Of Applied Research & Development. University Of Applied Research & Development understands that there may be certain situations where this is not possible, such as in prisons.
- 3.16 Sites with a high volume of registrations and/or Sites who deliver qualifications in high risk sectors such as Construction, may receive additional EQA monitoring to focus solely on the

review of the Site's management and quality assurance systems. These Sites will not be charged for their additional monitoring.

3.17 During the period of time between EQA monitoring, Sites may still submit recommendations for award to University Of Applied Research & Development even if they do not hold DCS for the units/qualifications that they submit results for. To enable results to be verified and processed by University Of Applied Research & Development, the Site may:

- a) Request an additional monitoring visit/full remote sample.
- b) Request individual portfolio signoffs.
- c) Wait until their next monitoring visit for EQA review.

3.18 Sites may request additional EQA monitoring, support visits or remote sampling from University Of Applied Research & Development at any time. Sites should request additional monitoring from the Quality Assurance Team, who will co-ordinate the process. Requested additional monitoring is chargeable to the Site, as detailed in University Of Applied Research & Development's Tariff.

4. University Of Applied Research & Development External Monitoring Procedure

External Quality Assurance Allocation

4.01 When Sites are granted approval, the University Of Applied Research & Development Quality Assurance Team, or Delivery Partner equivalent, will allocate the Site an EQA. Sites may be allocated more than one EQA dependent on the requirements of the qualifications in the Site's provision.

4.02 In order to ensure a fair and robust process, EQAs will not be permitted to work with the same Site for a period exceeding five academic years. EQA allocations will be reviewed at the start of each academic year and Sites will be advised of any changes.

4.03 Any conflicts of interests with regards to EQA allocations will be managed by University Of Applied Research & Development.

External Quality Assurance Planning

4.04 EQAs will contact Sites to arrange planned monitoring activities. The Site Contact/Quality Assurance Contact must work with the EQA to identify and agree convenient dates and times.

4.05 If a Site needs to cancel or re-arrange an EQA visit, then they must provide a minimum of 5 working days' notice. University Of Applied Research & Development understands that there may be mitigating circumstances where it may not be possible for the Site to provide the full notice period. If a Site fails to provide sufficient notice without reasonable cause, then they may be charged for the fee for a monitoring visit, as set out in the University Of Applied Research & Development Tariff.

- 4.06 EQAs will send a visit planner to the Site at least 10 working days prior to the EQA activity, except in the case of an unannounced visit or where visit arrangements do not allow. The planner will detail who will need to be present, observations planned, and the documentation and learner work that will need to be available. The EQA will want to meet learners and key Site staff, wherever possible.
- 4.07 It is the Site Contact/Quality Assurance Contact's responsibility to ensure that all relevant staff, learners and sites/satellite Sites are aware of the EQA activity and that access to the people and work identified is provided. Failure to make individuals or records available as requested without justifiable cause could lead to the application of a Sanction against the Site, and/or a charge for a monitoring visit.
- 4.08 If an EQA attempts to conduct a monitoring visit, however is not able to complete the visit due to the Site failing to inform University Of Applied Research & Development of a change to the venue/time, or have failed to maintain accurate Site details, the Site will be charged for the cost of the monitoring visit.
- 4.09 The Site must provide the necessary support to the EQA to enable them to complete their visit as planned including the provision of a quiet, secure area in which the EQA can work.

External Quality Assurance Reporting

- 4.10 Following completion of the monitoring activity, the EQA will discuss their findings with the Site verbally. The EQA will confirm to the Site their overall risk rating, including their rationale, as well as discussing evidence of good practice and the details of any corrective action or recommendations for improvement for the Site. The EQA may provide the Site with recommendations, provide them with actions or apply Sanctions:
- a) **Recommendations** are suggested amendments to current practice intended to further improve compliance arrangements.
 - b) **Actions** are mandatory and scope what is required to address areas of noncompliance.
 - c) **Sanctions** are penalties for non-compliance. Sites will be provided with actions to detail the steps required to remove the Sanction, if applicable.
- 4.11 At the completion of the visit, the EQA will summarise and document their findings on a University Of Applied Research & Development External Quality Assurance Visit report. The EQA Visit Report will be provided to the Site within three working days of the visit date. At this point, the Site will be provided with an opportunity to provide feedback on the visit to University Of Applied Research & Development.

5. University Of Applied Research & Development Internal Monitoring Procedure

Monitoring of Site Actions

- 5.01 If the EQA has set actions for the Site, then these must be addressed and evidence of completion provided to the EQA within the agreed timescales.

5.02 Where actions are deemed of high risk, the EQA will notify the Quality Assurance Team at University Of Applied Research & Development. The Quality Assurance Team, in conjunction with the EQA, will monitor the Site's response to the actions.

5.03 The EQA will notify the Site when action points have been satisfactorily addressed. At this point, the action will be deemed as closed and any relevant Sanctions applied due to the action will be reviewed.

5.04 A failure by a Site to implement corrective action within the specified timescale is likely to result in the escalation of a Sanction to a higher level. Factors such as the prevalence, persistence and severity of non-compliances are also likely to lead to a higher-level sanction. Failure to address actions may also increase the Site's assigned risk rating.

Sanction Levels

5.05 In instances of Site non-compliance, where there is a risk to the integrity of University Of Applied Research & Development products and/or to the interests of learners, University Of Applied Research & Development may apply Sanctions against the Site. Sanctions are penalties for non-compliance and, dependent on their level, affect a Site's registration, certification or Direct Claims Status rights.

5.06 University Of Applied Research & Development has a range of Sanctions that can be applied to a Site depending on the impact of the issues identified, the history of the Site's level of compliance with University Of Applied Research & Development, and the risk to the interests of learners and the integrity of University Of Applied Research & Development products.

5.07 University Of Applied Research & Development's Sanctions tariff is detailed in the table below:

Level	Sanction	Indicative Rationale
1	Action Plan	<ul style="list-style-type: none"> Non-compliance with University Of Applied Research & Development's Site Approval Criteria or regulatory conditions that do not impede the integrity of University Of Applied Research & Development provision. No immediate threat but limited confidence in certain areas has been identified.
2	Suspension or removal of Direct Claims Status Additional quality assurance visit ³	<ul style="list-style-type: none"> Threat to the integrity of University Of Applied Research & Development provision and to the interests of registered learners. Failure to address actions given by University Of Applied Research & Development/EQA.
3	Suspension of registration (3a)	<ul style="list-style-type: none"> Serious threat to the integrity of University Of Applied Research & Development provision and to the interests of registered learners.

³ Financial penalties will apply

	<p>Suspension of certification (3b)</p> <p>Suspension of trainer/assessor/IQA approval</p>	<ul style="list-style-type: none"> □ Loss of the integrity of assessment decisions and danger of invalid claims for certification. □ A failure to implement a specified action plan and corrective action.
4	<p>Removal of qualification/course approval</p> <p>Removal of trainer/assessor/IQA approval</p>	<ul style="list-style-type: none"> □ Repeated breach of the regulations relating to a specific qualification. □ Irretrievable breakdown in the management and quality assurance of specific qualifications or sector/subject area. □ Previously agreed corrective actions relating to a Level 3 non-compliance are not implemented.
5	<p>Removal of Site approval for all qualifications</p>	<ul style="list-style-type: none"> □ Loss of confidence in the Head of Site or senior management of the Site. □ Irretrievable breakdown in the management and quality assurance of University Of Applied Research & Development provision. □ A failure to co-operate with University Of Applied Research & Development requests to thoroughly investigate suspected malpractice. □ Consistent or repeated failure to pay invoices in agreement with University Of Applied Research & Development Terms.

5.08 Sanctions can be recommended by the Site's EQA or applied by a member of the Quality Assurance Team. Any Sanctions recommended by EQAs at Level 2 or above will be ratified by the Quality Assurance Team before being applied.

5.09 The nature of the Sanction and the rationale for its application will be communicated either by the Site's EQA Visit Report or by communication from the Quality Assurance Team.

5.10 The senior members of the University Of Applied Research & Development Quality Assurance Team monitor the application of Sanctions to ensure that they are consistently applied. The application of Sanctions is overseen by the Head of Assurance, who will report on Sanction activity to the Responsible Officer and other internal stakeholders when requested to do so.

5.11 University Of Applied Research & Development will seek to support Sites to comply with its requirements. Only in cases of serious non-compliance or the persistent failure of the Site to address outstanding actions will University Of Applied Research & Development apply the highest Sanctions (level 4 and 5). Notification of the application of this Sanction will be sent to the Head of Organisation at the Site in writing by the Head of Assurance.

5.12 Where a Level 5 Sanction is applied, all reasonable steps will be taken to protect the interests of any learners currently registered with University Of Applied Research & Development. Sites

must continue to demonstrate that they are able to provide appropriate support, advice and guidance for learners throughout the withdrawal process. Please refer to the University Of Applied Research & Development Site Withdrawal policy.

5.13 A Site may appeal against a Level 4 or 5 sanction. Please refer to the University Of Applied Research & Development Appeals policy for further guidance.

6. Document Revision

6.01 Changes to specific sections of this document from the previous version are listed below:

Section	Details of Change
All	This document combines the previous University Of Applied Research & Development Site Monitoring Policy, the University Of Applied Research & Development RiskBased Approach to Site Monitoring Procedure and the University Of Applied Research & Development Procedure for Site Sanctions.
3.09	The assigning of a Site's overall risk rating has been amended to focus just compliance with University Of Applied Research & Development requirements and no longer takes into account levels of registration or the risk of a Site's provision. New Sites are now also not automatically rated as high risk. The highest level of risk from the five 'risk areas' will be the Site's overall risk rating.
3.11	The 'marginal' risk rating has been removed. The risk table has been updated to reflect indicators of when the Site's next monitoring activity will take place based on their risk level, as well as any indicative Sanctions that may be applied.
3.14	Triggers for additional monitoring by University Of Applied Research & Development has been amended and clarified.
3.17	The results process where Sites do not hold DCS for qualifications has been amended and clarified.
4.06	The timescale for the University Of Applied Research & Development EQA sending the visit planner letter to Sites has been extended from 5 to 10 working days.
5.07	Addition of updated Sanctions tariff, which now includes delivery staff suspension and removal.