

SCOTTISH QUALIFICATIONS AUTHORITY

SQA's response to Petition PE 1484

Overview

SQA believes that the current well developed structure for ensuring the quality, accuracy and validity of SQA examinations works effectively and efficiently in the interests of those who participate in those examinations. There are detailed arrangements in place for dealing with complaints about the provision of national examinations. Those arrangements are subject to regular review and SQA is working closely with SPSO to ensure that complainants have access to effective redress.

Role and functions of SQA

SQA is established by the Education (Scotland) Act 1996. This Act establishes SQA as the national body in Scotland responsible for the development, accreditation, assessment, and certification of qualifications other than degrees. SQA's powers and functions can be altered by Act of the Scottish Parliament.

SQA's general functions¹ are to:

- ◆ devise and develop qualifications, and keep them under review
- ◆ approve education and training establishments as being suitable for presenting people for these qualifications
- ◆ make arrangements for, assist in, or carry out, the assessment of persons undertaking education and training
- ◆ determine the entitlement of individuals to SQA qualification
- ◆ award and record qualifications.

In carrying out these statutory functions, we:

- ◆ ensure that the specifications used to develop assessments are open and transparent
- ◆ work in partnership with all those involved in the assessment process to ensure that all assessments used in our qualifications are valid and reliable
- ◆ ensure that, so far as possible, all qualifications and assessments are fair and accessible and that the needs of our candidates are met in the administration of our assessments
- ◆ quality assure assessment processes and individual assessment judgements
- ◆ work in partnership with schools, colleges and others who deliver qualifications to ensure that all quality assurance, monitoring and evaluation processes are fair, open and proportionate
- ◆ consistently monitor and maintain the standards of our qualifications
- ◆ ensure that our work to develop assessments and set and maintain standards is open to external scrutiny by individuals, researchers, national or international bodies, as appropriate.

Quality assurance of assessments/examinations

¹ Section 2 of the Education (Scotland) Act 1996

We have processes and procedures in place to ensure that assessment methods are fit for purpose. We use a range of assessment tools for qualifications, as appropriate to the qualification type, subject and level. All SQA assessments are subject to rigorous quality assurance checks by experienced subject practitioners to ensure that the assessment of SQA qualifications is valid, reliable, fair and accessible and meets national standards year on year. Reports on the performance of Course assessment and on findings from external verification of assessments carried out in schools, colleges and other centres are published each year for each subject.

SQA monitors the performance of assessments and maintenance of standards over time. Each year, SQA evaluates the performance of its assessments: we gather qualitative and quantitative information to help us do this, and also use this information to prepare future assessments for National Courses. Course assessments are annually evaluated with learners and centres to continuously improve question paper design and maintain assessment standards. Our monitoring standards programme checks that qualifications are awarded on the basis of standards that are comparable over time. The programme includes yearly samples of assessments and candidate evidence covering various levels and areas in each of our main qualification types. Panels of subject experts evaluate whether assessment of the qualifications sampled has remained equally demanding over time, that candidates in one year have been set as demanding tasks as in a previous year, and that similar evidence has received the same judgement. Reports of this programme are published on our website, along with information on how SQA has addressed, or plans to address, any issues which have been identified by the panels.

SQA governance structure

SQA has a robust governance structure in place to ensure the quality and standards of all its qualifications and assessments. In addition to a Board of Management and Audit Committee, the SQA has:

- ◆ an Advisory Council appointed by Scottish Ministers to consider and provide advice to SQA on the needs and views of stakeholders, in order to help us make appropriate decisions on the development, maintenance and delivery of qualifications.
- ◆ a Qualifications Committee appointed by the Board to oversee issues of quality and standards of qualifications and assessments at a strategic and technical level.

These strong governance structures mean that SQA is recognised as self-regulatory.

SQA's handling of complaints

SQA is committed to ensuring that all those involved in assessment receive the best possible service. However SQA recognises that, sometimes, individuals experience problems and all complaints that are raised are taken very seriously. SQA will listen to the customer and seek to understand the reasons for the complaint with a view as to how we might address the concerns and improve our service. SQA always strives to deal with all complaints quickly and fairly.

Members of the Petitions Committee will be aware that in March 2011 the Scottish Public Services Ombudsman published a model Complaints Handling Procedure (model CHP) for the Scottish Government, Scottish Parliament and Associated Public Authorities in Scotland under section 16B of the SPSO Act 2002.

SQA fully endorses the SPSO's Statement of Complaint Handling Principles and we are committed to adopting the model CHP for the sector as demonstrated by our submission of the SPSO's compliance statement and self-assessment survey indicating our readiness to adopt the model CHP by March 2014. Our submission states our commitment to:

- using the definition of a complaint as expressed by the SPSO
- adopting the specified number of stages for complaints handling and the timescales for each stage
- recording, reporting and publicising complaints information.

SQA has proactively engaged with the SPSO over proposed revisions to our complaints handling procedures to take account of the models applicable to schools and colleges. These discussions were initiated by SQA before the model for our sector was published and we are collaborating with SPSO on a Memorandum of Understanding to ensure that complainants have access to the most effective form of redress.

The revised complaints handling procedure developed by SQA aims to get things right first time and will apply across all functions of the organisation. Staff will be trained in how and when to respond to a complaint, including when to escalate a complex complaint to the most appropriate colleague for investigation and a response according to the published timescales. The background information provided to the Petitions Committee referred to media coverage of SQA and the list of SPSO Decision Reports outlining their findings in complaints about SQA. The Committee will note that the SPSO has not considered it necessary (or in the public interest) to submit a Report to Parliament following their investigations into complaints about SQA. Of the five Decision Reports covering the period October 2011 to May 2013, three were not upheld, one partially upheld, and in the case relating to this petition, the SPSO acknowledged that the SQA had already taken steps to respond to elements of the complaint. Learning from complaints is important to SQA to ensure that we implement improvements to our products and services.

SQA has also responded to requests for information from the SPSO in full and on time to assist in their investigations and have received confirmation from the SPSO that they have been satisfied with the actions we have taken in response to their recommendations, including letters of apology to complainants.

Role of SPSO

In relation to SQA, the matters which the SPSO may investigate are:

- action taken in the exercise of SQA's administrative functions, but only where the complainer has claimed to suffer injustice or hardship as the result of maladministration in the exercise of those functions; or
- service failure by SQA, but only where the complainer claims to have suffered injustice or hardship as the result of that service failure.

In either case, the requirement for the complainer to have suffered injustice or hardship ensures that resources are directed at complaints which meet a minimum level of seriousness in terms of impact on the complainer.

Response to the Petition

SQA's current arrangements are those set in place by the Scottish Parliament and, of course, if the Scottish Parliament were to decide that changes were required then SQA would operate in the manner as decided upon by the Scottish Parliament and Ministers.

However, we do not think that the proposals are appropriate, for the following reasons:

- ◆ As explained more fully above, SQA in its role of national qualifications body regulates the quality, accuracy and validity of SQA examinations and the quality assurance mechanisms and governance structure already in place ensure rigorous monitoring of standards.
- ◆ The process of developing qualifications and setting examinations requires SQA examining teams to exercise their professional and academic judgment, drawing on a wide range of subject specific knowledge and assessment expertise. Complaints amounting to a difference of opinion on the merits of examinations are not amenable to review by the SPSO unless there has been maladministration.
- ◆ Without maladministration, it would not be appropriate for the SPSO (or any other body) to substitute its view for the judgment of the national qualifications authority on the setting of examinations.