



Action Plan

This Action Plan must be completed electronically and submitted in Microsoft Word format to regulation@qualifications.gov.scot by 1 April 2026.

Issue number	Detail of Issue recorded	Risk rating	Proposed action and evidence to be provided (Failure to include a description of your intended methodology AND details of the evidence that you will provide could result in your Action Plan not being approved by ACG.)	Target date for completion by awarding body ¹	Date Issue closed out by Qualifications Scotland Accreditation ²
1. Principle 9	A pre-audit review of submitted provider lists noted that BIIAB has not fully complied with the information requirements, choosing to provide internally devised qualification codes, and not those	Low	Action: BIIAB reviewed the template used prior to submitting the Provider List data submission on 31 st January 2026 to ensure all relevant fields were captured in line with the required up to date template. Evidence to be submitted to Qualifications Scotland Accreditation: Submission of data via our SharePoint folder in line with submission date which had a deadline of 31	30/06/2026	27/5/2026

¹ If the awarding body believes it has completed the action prior to approval of the Action Plan by ACG, insert the considered date of completion. The date will be subject to review depending on the quality of the evidence supplied.

² Issues can only be closed once the evidence to complete the action has been quality reviewed and the Action Plan has been approved by ACG. The period of time between ACG approval and the date the Issue is closed out is not necessarily reflective of any quality issues.

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	allocated by Qualifications Scotland Accreditation at the point of accreditation.		January 2026. This submission has been completed and added to our SharePoint folder as evidence in support of Principle 9.		
2. Principles 13 and 15	At the audit, no evidence to support retrospective internal quality assurance of candidates achieving Qualifications Scotland accredited qualifications, in the period of August 2024 to January 2025, at a provider without a fully qualified Internal Quality Assurer was noted. Subsequently, the audit team had concerns around the fact there was still no	Medium	Action: During 2025 BIIAB External Quality Assurers (EQAs) transitioned to a new process where the reports completed moved from covering multiple activities to being specific to one visit and one sector with specific course ID which clearly relates to Internal Quality Assurance (IQA) as well as where Direct Claim Status (DCS) has been approved/removed or continued. All sections also have a free text box for additional information to support the decisions taken. The current version of the External Quality Assurance (EQA) report continues to be refined to ensure there is a clear focus on confirmation that the IQA is suitably qualified going forward.	31/07/2026 Extension to 31/8/2026	

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	fully qualified Internal Quality Assurer in place at the provider to countersign decisions made by the member of staff undertaking an IQA qualification, leading to a potentially inappropriate decision to reinstate direct claim status at that time.		We have also reviewed our Internal Quality Assurance Policy. The centre is also currently undergoing a restructure which will result in additional assessors and IQA being in place going forward. In order to address the period August 2024 to June 2025 we are proposing to contact the IQA to undertake a retrospective review of the learner evidence and feedback linked to the IQA process during this period to confirm if the decisions taken then would still be appropriate today. We understand that that asking for this exercise to be undertaken risks identifying learners who may not have met the requirements for certification and should that be identified we would request that those learner be recalled to fulfil any requirements. Evidence to be submitted to Qualifications Scotland Accreditation: A report on the retrospective review of IQA activity undertaken at the centre between August 2024 and June 2025 will be provided to support the activity and outcomes.		

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			Where appropriate, revised policies will be uploaded to our websites and will be included in our Centre Recognition process. They will also be uploaded to SharePoint.		
3. Principle 15 and RPDIR - 3	The audit team noted concerns around the consistency and content of certificates issued to learners undertaking all Qualifications Scotland accredited provision across all approved providers. Evidence indicated that BIIAB is issuing e-certificates that are significantly different from the exemplars held on SharePoint, and the hard copy certificates issued to learners.	High	Action: We note that the name of the provider should not have been included on the eCertificates in line with the then named SQA Accreditation guidelines in operation at the time. In addition, it has become apparent that approval had not been requested to allow provider names on its eCertificate. However, going forward I am aware, as the Accountable Officer of the requirement and will ensure that this is undertaken prior to any future changes to the eCertificate. Working with Advance Secure, we secured a new draft template to share with now named Qualifications Scotland Accreditation on 9th December 2025 and following confirmation that this new design which is more aligned with the physical certificate was acceptable BIIAB Qualifications Limited has implemented this update on our templates going forward.	30/06/2026	27/5/2026

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	Qualifications Scotland Accreditation was not notified or aware of this variation in the e-certificate exemplar and therefore not in a position to approve it. It was also noted that provider names had been included on e-certificates. BIIAB had not submitted any request for approval to include this information on Qualifications Scotland accredited qualification certificates.		Evidence to be submitted to Qualifications Scotland Accreditation: Draft eCertificate template was shared for approval on the 9th of December 2025. Approval was received on 12th December 2025 from John Byrne. Email provided for confirmation of approval. Sample eCertificate and physical certificate which included new regulator logos and new BIIAB CEO signature uploaded to SharePoint under folder RP15. When DC Web updated the approved template, this was applied to all previous qualifying awards which eliminated the need to recall and republish. I will provide an up-to-date figure of the number of certificates that were affected.		
4. Principle 18	On 30 October 2025, BIIAB notified Qualifications Scotland Accreditation of suspected malpractice	Medium	Action: The initial notification from the BIIAB Centre Support team in connection with potential malpractice at an approved centre which delivers Qualifications Scotland accredited Security qualifications followed	30/06/2026	27/5/2026

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	at an approved centre delivering Qualifications Scotland accredited Security qualifications. The original notification of suspected malpractice by BIIAB's Customer Support team occurred on 2 October 2025, which was almost a month before Qualifications Scotland Accreditation was notified. The delayed notification timescale indicates that the investigation did not comply with Qualifications Scotland Accreditation's		contact from the centre in connection with outstanding certificates. A review of the cohort's exam analysis was undertaken which gave cause for concern and a registration lock was applied to prevent further learners being registered. A course which was already taking place at a site in Glasgow was allowed to continue with additional safeguards in place as at that time we could not confirm if this was an isolated or more widespread case. Analysis of the course which was allowed to continue showed a wider spread of results with a number of fails recorded. I acknowledge the significant delay in bringing this to the attention of the regulator however would also advise that BIIAB considered this the earliest opportunity to bring to the attention of Qualifications Scotland Accreditations so that we had some level of confidence in the information that we were able to share. Going forward we confirm that we would share this information as soon as we become aware of the potential for malpractice and before any investigation is undertaken. Our Malpractice		

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	regulatory requirements. Also, Section 4 of BIIAB's Malpractice and Maladministration Policy, 01/05/2025, Version: 1.1, notes that the awarding body may choose not to notify Qualifications Scotland Accreditation of suspected malpractice. This is not compliant with the relevant regulatory requirements.		and Maladministration Policy has also undergone further review and has been updated and rebranded appropriately to accurately reflect our obligations. Evidence to be submitted to Qualifications Scotland Accreditation: The Malpractice and Maladministration Policy has been uploaded to our websites and to our SharePoint folder against RP18. Any future potential malpractice will be notified by email by the Accountable Officer.		

Action Plan approved by ACG on 27/05/2026