

Audit Report BIIAB

12 November 2025

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1 Background

This was the eighth audit of BIIAB since it was approved as an awarding body by Qualifications Scotland Accreditation (previously SQA Accreditation) in 2006.

As part of the Skills and Education Group, BIIAB is an awarding and End-Point Assessment Organisation working with learning providers, employers and further education colleges. BIIAB is approved to offer a number of Qualifications Scotland accredited qualifications in the licensed retail, security, as well as the fashion and textiles sectors.

BIIAB's headquarters are in Nottingham.

1.1 Scope

Qualifications Scotland Accreditation carries out quality assurance activity in line with its *Quality Assurance of Approved Awarding Bodies Policy*. This states the type and frequency of our quality assurance activities, describes our reporting procedures and indicates how the awarding body's Quality Enhancement Rating is calculated.

As this was a scoped audit of BIIAB, only specific regulatory requirements were included within the scope of the audit. Our quality assurance activities are conducted on a sampling basis and, consequently, not all aspects of the awarding body's systems, procedures and performance have been considered in this report to the same depth.

Qualifications Scotland Accreditation audit reports are written by exception focusing only on those areas where corrective action is required or recommended. Consequently, this approach to audit reporting does not detail areas where compliance or good practice was found.

The audit was designed to ensure BIIAB complies with Qualifications Scotland Accreditation's regulatory requirements namely:

- *Qualifications Scotland Accreditation Regulatory Principles (2021)*
- all Regulatory Principle Directives
- the awarding body's Accreditation Licence

Awarding body documentation considered for review by the audit team includes all documents banked on BIIAB's SharePoint site at the time of audit and information supplied to support audit activity. Restricted or commercially sensitive information gathered during Qualifications Scotland Accreditation's quality assurance activities is treated in the strictest confidence.

1.2 Audit Report and Action Plan Timescales

BIIAB audit date: 12 November 2025

Audit Report approved by

Accreditation Co-ordination Group on: 18 February 2026

Audit Report to be signed by BIIAB: 1 April 2026

Action Plan to be emailed

to regulation@qualifications.gov.scot by BIIAB: 1 April 2026

The process will apply in relation to the timescales specified above:

- The awarding body will be sent a signed copy of the Audit Report by email.
- The awarding body must sign the copy of the Audit Report and return by email to Qualifications Scotland 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@qualifications.gov.scot.
- Qualifications Scotland 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 copy of the Action Plan and return by email to Qualifications Scotland Accreditation.

The findings of this Audit Report and the associated Action Plan will be published on Qualifications Scotland Accreditation's website following signed agreement.

Qualifications Scotland 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 Audit Issues and Recommendations

An Issue has been recorded where evidence shows that the awarding body is not compliant with Qualifications Scotland 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 BIIAB as a separate document to the Audit Report and must be submitted to Qualifications Scotland Accreditation in accordance with the timescale specified in 1.2.

As a result of the audit and post-audit activities, four Issues have been recorded, and three Recommendations have been noted.

Issue	Detail of Issue recorded	Risk rating
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 allocated by Qualifications Scotland Accreditation at the point of accreditation.	Low
2. Principles 13 and 15	At the audit, there was 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. Subsequently, the audit team had concerns around the fact there was still no 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.	Medium
3. Principle 15 and RPDIR - 3	The audit team noted concerns around the consistency and content of certificates issued to learners undertaking all Qualifications	High

Issue	Detail of Issue recorded	Risk rating
	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. 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.	
4. Principle 18	On 30 October 2025, BIIAB notified Qualifications Scotland Accreditation of suspected malpractice 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 regulatory requirements. Also, Section 4 of <i>BIIAB's Malpractice and Maladministration Policy, 01/05/2025, Version: 1.1</i>, 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.	Medium

A Recommendation has been noted where Qualifications Scotland 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 9	BIIAB may wish to continue the good work in reviewing SharePoint on a more regular basis to ensure the documentation and information is current and relevant, as and when appropriate.
2. Principle 13	BIIAB may wish to consider amending the <i>External Quality Assurance Policy, 2024 V1</i> , to incorporate a specific and recurring time frame by which the activity must take place and removing the phrase 'from time to time'.
3. Principle 14	To ensure that all learners are fully protected, BIIAB may wish to revise the <i>Access to Assessment Policy V1.23-24</i> to fully and accurately include all of the protected characteristics as detailed in the Equality Act 2010.

1.4 Risk Rating of Issues

Qualifications Scotland Accreditation assigns a rating to each Issue recorded, depending on the impact on or risk to the awarding body's operations, its Qualifications Scotland accredited qualifications and/or the learner.

Issues recorded during the audit will count towards BIIAB'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 [Qualifications Scotland Accreditation](#) website.

2 Detail of Audit Issues and Recommendations

The following sections detail Issues recorded, and Recommendations noted against Qualifications Scotland Accreditation's regulatory requirements.

2.1 Issues

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

All approved awarding bodies are required to submit provider lists on a timescale specified by Qualifications Scotland Accreditation.

Using a template provided by the regulator, the information should identify details of:

- all approved providers
- the Qualifications Scotland accredited qualifications, units, and workplace core skills that they are approved to deliver
- the relevant qualification code allocated at the point of accreditation
- the number of learners registered and certificated over the previous twelve months for each provider
- an indication if each provider is currently active or inactive

A pre-audit review of submitted provider lists, including the period 1 July 2024 to 30 June 2025, noted that BIIAB has not fully complied with the requirements stated above, choosing to provide internally devised qualification codes, and not those allocated by Qualifications Scotland Accreditation at the point of accreditation.

This has been recorded as **Issue 1**.

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.

And

Regulatory Principle 15. The awarding body must have effective, reliable and secure systems for the registration and certification of learners.

Provider monitoring activity undertaken in October 2025 identified that an approved centre delivering the BIIAB Award in Emergency First Aid at Work at SCQF Level 6 R866 04 and the BIIAB Award in First Aid at Work at SCQF Level 6 R867 04 qualifications had failed to meet the requirement for having a fully qualified Internal Quality Assurer for the period August 2024 to January 2025.

The BIIAB Qualification Guidance for the BIIAB Award in Emergency First Aid at Work at SCQF Level 6 R866 04 states that those ‘involved in the internal quality assurance of these qualifications (IQAs) must have knowledge and competency in first aid as well as knowledge and competency in internal quality assurance’, the latter being evidenced by holding ‘an acceptable internal quality assurance qualification/CPD training’.

During this period, the provider in question held direct claim status (DCS) and certificated candidates for both of the above Qualifications Scotland accredited qualifications.

The lack of internal quality assurance during this period was noted in the BIIAB External Verifier Report dated 20 November 2024, with a Level 2 sanction being recommended as a matter of urgency.

The awarding body’s *Sanctions Policy, v1.22-23*, notes that the following range of actions can be applied as a consequence of a Level 2 sanction:

- Removal of direct claims status
- Removal of remote External Quality Assurance
- Scrutiny of the integrity of assessment decisions required
- Additional External Quality Assurance / Compliance visit (at cost to the Centre)

- External Quality Assurance of whole cohort (at cost to the Centre)
- Advisory Visit (at cost to Centre)
- Review / revalidation of internal assessment tasks (at cost to the Centre)

While the External Verifier Report of November 2024, and subsequent visit report of 3 March 2025, outlined a number of timebound actions that the provider was required to undertake to resolve the issue of no internal quality assurance, it was difficult to determine which, if any, of the above actions had been specifically implemented, including if the option for DCS remained in place.

Discussions with awarding body representatives during the audit did not sufficiently clarify the situation, but following the audit, the awarding body's Head of Compliance and Regulation confirmed that the Level 2 sanction applied on 30 November 2024 did result in the removal of DCS, though no documentation in support of this was available. It was also stated that the sanction was downgraded to a Level 1 sanction following a subsequent visit on 3 March 2025 when it was noted that a member of provider staff was now undertaking an appropriate IQA qualification and hoped to complete this by June 2025. The reinstatement of DCS was also recommended as part of the 3 March report.

However, the report of 30 November 2024 states that quality assurance decisions were 'not sampled as currently the centre does not have an Internal Quality Assurer in place to conduct quality assurance activities across the learners' completed portfolios', with the subsequent report of 3 March 2025 noting that the External Verifier sampling of 'records that the IQA has completed for the learners' did not start until 16 January 2025. Therefore, the audit team remains concerned that no retrospective quality assurance of those candidates achieving Qualifications Scotland accredited qualifications in the period of August 2024 to January 2025 can be evidenced.

With this mind, alongside the fact there was still no fully qualified Internal Quality Assurer in place at the provider to countersign decisions made by the member of staff undertaking an IQA qualification, the decision to reinstate DCS seemed inappropriately early at that time.

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

Regulatory Principle 15. The awarding body must have effective, reliable and secure systems for the registration and certification of learners.

And

RPDIR — 3 Logos and certificate requirements for Qualifications Scotland accredited qualifications

Evidence reviewed as part of the provider monitoring activity undertaken in October 2025 indicated that BIIAB was issuing e-certificates that were significantly different from the exemplars held on SharePoint and the hard copy certificates issued to learners.

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.

The audit team were advised that the different format for e-certificates was the result of trying to incorporate additional security measures elements to minimise the opportunity for the creation of fraudulent certificates. While fully appreciating the aim, the audit team were not fully convinced that the variations successfully supported this rationale.

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.

The discussions also sought to clarify what a learner should receive on achievement of a Qualifications Scotland accredited qualification, and it appeared that there was no consensus amongst awarding body representatives, with some believing that e-certificates were an optional choice alongside hard copy certificates, and others believing that both were issued as a matter of course.

Overall, 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.

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

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

On 30 October 2025, BIIAB notified Qualifications Scotland Accreditation of suspected malpractice at an approved centre delivering Qualifications Scotland accredited Security qualifications. During the audit, awarding body representatives provided additional information on how the incidence of malpractice was identified, the steps taken as part of the investigation, which included a suspension of registrations and potential to recall certificates, as well as confirming that it remained ongoing.

The audit team were content that the steps taken so far have been sufficiently robust, and that those subsequently planned were appropriate and proportionate to the seriousness of the issue.

However, 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 regulatory requirements. For example, the supplementary information and requirements for Regulatory Principle 18 notes that the 'awarding body must inform Qualifications Scotland Accreditation at the earliest opportunity, preferably prior to investigatory activities, of suspected or actual cases of malpractice and/or maladministration'.

Qualifications Scotland Accreditation's *Regulatory Principles Guidance Note – Principle 18, Reporting and Managing Cases of Malpractice and Maladministration, Version 3 (Sept 2025)*, also notes that 'awarding bodies must notify their assigned Regulation Manager of suspected as well as actual malpractice at the earliest opportunity. It is preferable that this occurs before any investigation takes place'.

Lastly, Section 4 of BIIAB's *Malpractice and Maladministration Policy, 01/05/2025, Version: 1.1*, notes that one of the courses of action for dealing with cases of suspected malpractice, is to 'consider whether the Regulators and other Awarding /

Apprenticeship Assessment Organisations should be notified'. The possibility that the awarding body may choose not to notify Qualifications Scotland Accreditation of suspected malpractice is also not compliant with the regulatory requirements described above.

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

2.2 Recommendations

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

A review of BIIAB's SharePoint site provided evidence that the awarding body had undertaken some considerable work in ensuring that the available documentation and information, including policies and procedures, was as current as possible in preparation for the audit.

However, the audit team noted a number of instances where key documents were not available through SharePoint. Examples include the Standard Operating Procedure (SOP) for the Accountable Officer, which the *BIIAB Qualifications Limited Self-Assessment for SQA Accreditation 2024* noted as being available, the Strategic Plan 2025 – 2027, as well as the awarding body's Centre Assessment Standards Scrutiny (CASS) Strategy, which underpins assessment and quality assurance activities.

Therefore, BIIAB may wish to continue the good work in reviewing SharePoint on a more regular basis to ensure the documentation and information is current and relevant, as and when appropriate.

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

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.

On reviewing BIIAB's *External Quality Assurance Policy, 2024 V1*, the audit team noted the following statement as part of Section 1.6:

For SQA accredited qualifications we will undertake an observation of teaching and delivery from time to time.

Evidence viewed as part of Qualifications Scotland Accreditation's most recent provider monitoring activity, which occurred on 30 October 2025, notes that the observation of teaching and assessment has taken place at provider assessment locations for specifically sampled Qualifications Scotland accredited qualifications.

However, during the audit, it was difficult to ascertain if this is carried out in a systemic way across all provision. The audit team believes that the phrase 'from time to time' in the policy leaves the frequency of practice open to interpretation.

Therefore, to ensure a consistent and rigorous approach to the observation of teaching and delivery, BIIAB may wish to consider amending the *External Quality Assurance Policy, 2024 V1*, to incorporate a specific and recurring time frame by which the activity must take place and removing the phrase 'from time to time'.

This has been noted as **Recommendation 2**.

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.

BIIAB's *Access to Assessment Policy V1.23-24* states that 'in accordance with Equalities Law', the awarding body 'demonstrates its commitment to ensuring that individual learners have fair access to its qualifications and assessments in two ways'.

One of these ways is through the recognition of 'the diverse needs of learners at the stage where qualifications and assessments are designed and developed', with the awarding body taking 'a positive approach to the provision of a range of flexible and responsive qualifications and assessment methods' aimed at providing 'the same access for all learners by seeking to remove barriers which may place people of different religions and beliefs, racial backgrounds, ages, ability, sexual orientation, gender, political beliefs, or any other status at a disadvantage'.

The audit team noted that the list of individual backgrounds and types appeared to only partly reflect the protected characteristics in the Equality Act 2010. To ensure that all learners are fully protected, BIIAB may wish to revise its policy to fully and accurately include all of the protected characteristics as detailed in the Act.

This has been noted as **Recommendation 3**.