



Qualifications Scotland Accreditation Regulatory Framework

Published by the Qualifications Scotland
Qualifications Scotland Accreditation
The Optima Building, 58 Robertson Street, Glasgow, G2 8DQ

<https://accreditation.qualifications.gov.scot/accreditation/home>

The information in this publication may be reproduced in support of Qualifications Scotland Accreditation. If it is reproduced, Qualifications Scotland should be clearly acknowledged as the source. If it is to be used for any other purpose, then written permission must be obtained from Qualifications Scotland. It must not be reproduced for trade or commercial purposes.

© Qualifications Scotland 2026

Contents

1	Introduction	1
2	About Qualifications Scotland Accreditation	3
3	Regulatory activity	5
3.1	Regulatory vision	5
3.2	Regulatory responsibilities	5
	3.2.1 Awarding body approval	5
	3.2.2 The Accreditation Licence	6
	3.2.3 Accreditation and qualification conditions	6
4	How we regulate	7
4.1	Activity	8
	4.1.1 Initial activity	8
	4.1.2 Ongoing approval activity	8
4.2	Regulatory Requirements	9
4.3	Awarding body risk assessment	10
4.4	Audit and provider monitoring strategy	10
	4.4.1 Frequency of activity	10
	4.4.1.1 Audits	11
	4.4.1.2 Provider monitoring activity	11
4.5	Planning for audits and provider monitoring activity	12
	4.5.1 Reporting	12
	4.5.2 Recording	133
4.6	Extraordinary Issues	133
4.7	Sanctions	13
5	Awarding body activities	1
5.1	Provider lists	1
5.2	Self-assessment	1
5.3	Data returns	1
6	Withdrawal of awarding body approval	2
7	Overview of lifecycle of awarding body approval	3
8	Our policies and documents	4

1. Introduction

Qualifications Scotland Accreditation's Regulatory Framework has been shaped with reference to:

- The Scottish Government's [Business Regulation agenda](#)ⁱ, which aligns to the five principles of Better Regulation by being:
 - proportionate
 - accountable
 - consistent
 - transparent
 - targeted only where needed
- The Scottish Regulator's [Strategic Code of Practice](#)ⁱⁱ
- [National Performance Framework](#)ⁱⁱⁱ
- [Scottish National Outcomes](#)^{iv}

Qualifications Scotland Accreditation recognises that the way it operates and interacts with those that it regulates can make a significant contribution to sustainable economic growth in Scotland's educational landscape. Knowing this, it will seek to continuously improve its understanding of regulated organisations.

Aligned to the Scottish Regulators' Strategic Code of Practice and National Performance Framework, we will focus on the following strategic objectives from the Scottish National Outcomes:

- We are well educated, skilled and able to contribute to society.
- We have a globally competitive, entrepreneurial, inclusive and sustainable economy.
- We grow up loved, safe and respected so that we realise our potential.
- We live in communities that are inclusive, empowered, resilient and safe.
- We are creative and our vibrant and diverse cultures are expressed and enjoyed widely.
- We value, enjoy, protect and enhance our environment.
- We have thriving and innovative businesses, with quality jobs and fair work for everyone.
- We are healthy and active.
- We respect, protect and fulfil human rights and live free from discrimination.
- We tackle poverty by sharing opportunities, wealth and power more equally.
- We are open, connected and make a positive contribution internationally.

In undertaking its work, Qualifications Scotland Accreditation will seek to:

- adopt a positive enabling approach in pursuing outcomes
- be aware of other interests within the vocational education and training sector
- adopt risk-based and evidence-based protocols
- develop effective relationships with those that we regulate
- commit to advice and support for those who wish to comply
- recognise the five principles of Better Regulation
- pursue continuous improvement in regulatory practice
- deliver an efficient, effective and timely service
- work collaboratively with other regulators to understand and address future challenges

This document sets out our framework for regulating awarding bodies approved to deliver qualifications accredited by Qualifications Scotland Accreditation. Responsibility for this framework falls under the remit of the Regulation section.

2.About Qualifications Scotland Accreditation

Under the [Education \(Scotland\) Act 2025](#)^v, SQA Accreditation has a statutory remit to independently accredit and quality assure qualifications and regulate approved awarding bodies. In this way it safeguards the interests of learners, employers, parents and carers, funding bodies, government and end-users of services.

Qualifications Scotland Accreditation has four separate functions:

- 1 accreditation
- 2 regulation
- 3 information and research
- 4 administration

The work of Qualifications Scotland Accreditation is overseen by the Accreditation Committee (AC). The AC is accountable to Scottish Ministers and ensures that there are appropriate governance mechanisms in place with regards to Qualifications Scotland Accreditation's functions. AC has devolved some decision making to the Accreditation Co-ordination Group (ACG) and reviews any decisions made. They also review quality assurance audit outcomes, our in-house research work, and any other business that is relevant to the function of Qualifications Scotland Accreditation.

The primary role of ACG is to make group decisions in relation to awarding bodies and the qualifications they offer. This includes:

- a. awarding body approval
- b. awarding body quality assurance issues including audit outcomes, audit reports and action plans
- c. provider monitoring reports, their outcomes, recommendations and impact on awarding body quality assurance measures

Qualifications Scotland Accreditation carries out its regulatory functions to provide the Scottish Government, the Chief Executive and the Accreditation Committee with assurances of compliance and quality across accredited provision. Qualifications Scotland Accreditation also ensures that its regulatory function is carried out economically with efficient use of public funds and in line with the organisation's risk management and governance arrangements.

In line with Qualifications Scotland Accreditation's Quality Assurance Policy, we take a risk-based, targeted approach to regulation and will use all resources, tools and techniques available to help identify areas of greatest risk and concern. We have at our disposal tools such as:

- awarding body audits
- provider monitoring activity

- self-assessments
- risk profiling
- external information sharing / intelligence
- accreditation submissions
- any other relevant information available to Qualifications Scotland Accreditation

This will help deliver compliance and quality assurance in a focused way, targeting issues where evidence indicates that there is a risk.

This approach assures that Qualifications Scotland Accreditation will deliver:

- effective regulatory compliance
- high standards of quality assurance
- promotion of continuous improvement
- the safeguarding of the interests of learners, employers, parents, funding bodies and the Scottish Government

3.Regulatory activity

3.1 Regulatory vision

Our regulatory vision is to:

- accredit and quality assure credible qualifications that are fit for purpose and provide meaningful opportunities for learners.
- raise our profile and reputation with other sector regulators by providing increased regulatory value
- build memoranda of understanding with stakeholders where possible, to enable the sharing of information to raise quality within the vocational education and training sector
- ensure ongoing staff professional development that is relevant to our role and auditing strategy
- have a standardised approach to ensure consistency
- have a targeted approach to ensure finite resources are used where most needed

3.2 Regulatory responsibilities

Qualifications Scotland Accreditation's Regulation section has responsibility for:

- approving awarding bodies
- conducting awarding body audits and provider monitoring activity to ensure that awarding bodies conform to the Regulatory Principles, Directives and Accreditation Licence
- reviewing and managing the risk rating of awarding bodies
- reviewing and providing feedback on awarding body self-assessment reports
- managing awarding body action plans
- investigating complaints about awarding bodies,
- investigating compliance issues
- investigating cases of malpractice or maladministration
- dealing with any extraordinary issues that involve approved awarding bodies outside of planned assurance activities
- provision of regulatory guidance to stakeholders
- ad-hoc awarding body reportable incidents

3.2.1 Awarding body approval

Qualifications Scotland Accreditation will accept enquiries about becoming an approved awarding body from those organisations that meet our General

Approval Requirements. Before proceeding to the formal application stage, we require potential awarding bodies to demonstrate that:

- 1 they have a track record of awarding and certificating qualifications
- 2 they are based and operate within the European Union or European Free Trade Association
- 3 they can provide evidence of financial stability
- 4 there are no grounds to believe that directors, persons with significant control or senior managers are unfit to be in charge of the organisation

Following the enquiry stage, the normal process for approval is as follows:

- 1 Initial checks are made to ensure General Approval Requirements are met.
- 2 AC1 form is submitted along with the Qualification Accreditation form (AC2 form).
- 3 Risk assessment of the organisation:
 - Once the AC1 form is received, Qualifications Scotland Accreditation will undertake a further risk assessment of the organisation aligned to specific industry sector, fraud, delivery and resource risks before granting any awarding body status.
- 4 Approval submission is presented to ACG:
 - Qualifications will also be accredited at this point.

Any variation to (or deviation from) the above process is at the discretion of Qualifications Scotland Accreditation and will be agreed with the applicant.

3.2.2 The Accreditation Licence

Once awarding body approval status has been granted by ACG, an Accreditation Licence will be issued to be signed by the licensee (the awarding body). The licence will set out the terms of the regulatory relationship as well as all rights and obligations on both parties. The Accreditation Licence grants Qualifications Scotland Accreditation awarding body approval to the organisation.

3.2.3 Accreditation and qualification conditions

The awarding body must present a qualification for accreditation in order to be eligible for approval. Qualifications Scotland Accreditation reserves the right to apply conditions to awarding body approval in cases where there are perceived risks and weaknesses that may need to be addressed through the course of regulation of the qualification.

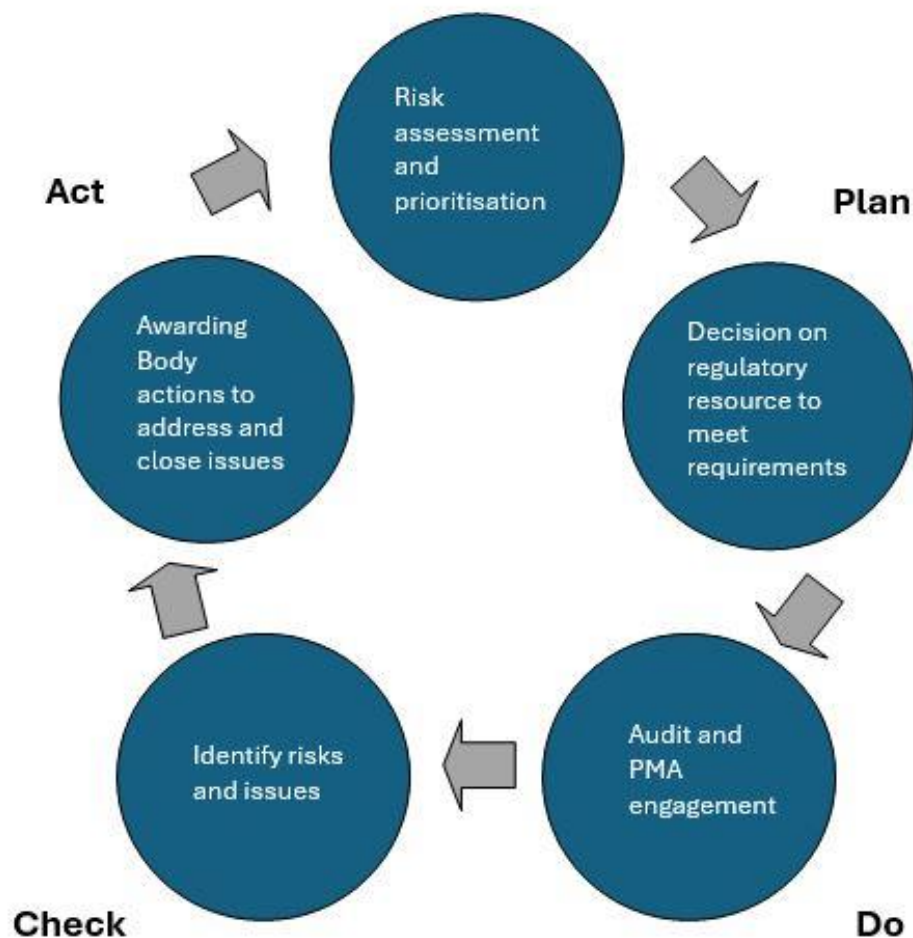
4. How we regulate

Once awarding body status is approved, the organisation will fall into our regulatory cycle. Audit and provider monitoring activity (PMA) will commence to ensure regulatory compliance.

We follow the model of continuous improvement — Plan Do Check Act (PDCA) — which sets out how we will:

- plan our audits in line with our risk-based approach
- allocate resource
- carry out quality assurance activities
- require approved awarding bodies to act on our findings.

Figure 1: Qualifications Scotland Accreditation regulatory cycle



4.1 Activity

There are distinct types of activity that can be conducted, including:

Initial approval activity

- pre-approval visits
- post-approval visits

Ongoing approval activity

- full audits
- full provider monitoring activity
- scoped audits
- scoped provider monitoring activity

4.1.1 Initial activity

Qualifications Scotland Accreditation may conduct approval visits to newly approved awarding bodies as part of our enabling approach to regulation. This type of visit will provide an opportunity to ensure awarding bodies understand their role as an approved awarding body and will support them through the early stages of being an approved awarding body. In all cases, awarding bodies will be subject to a full audit 12 months after approval.

4.1.2 Ongoing approval activity

Based on an evaluation of risk, Qualifications Scotland Accreditation will decide at the beginning of each cycle what resources are required for both audits and provider monitoring activity.

Where the risk is considered greater, audits and provider monitoring activity will be conducted in person, where possible, with appropriate consideration to staff safeguarding in relation to awarding body premises and provider types and locations.

Where risk is considered low, audit and provider monitoring activity may be conducted remotely via desktop activities.

Medium risks will be considered on the merits of each case and the context of the quality assurance activity.

Scoping

An awarding body's risk rating, or occasional mandatory investigatory work required by Government, may require a scoped approach to audits and provider monitoring activity. Qualifications Scotland Accreditation may choose to focus on those areas where trend analysis has highlighted a risk of non-compliance with the Regulatory Requirements, or where a select number of Regulatory Principles

are identified for the year to review across all awarding bodies, or specific issues need to be explored in more depth.

This may mean that some areas of the Regulatory Principles may not always be fully covered during any audit or provider monitoring activity. However, all principles and directives will be continually monitored to identify trends.

This approach allows for standardisation in regulatory approach and efficient use of resource.

Scoping of audits and provider monitoring activity will be determined in advance of the planned cycle and endorsed by the AC.

4.2 Regulatory Requirements

Qualifications Scotland Accreditation's Regulatory Requirements include the Regulatory Principles, Regulatory Principle Directives and the Accreditation Licence.

The Regulatory Requirements are intended for use by existing organisations, new organisations seeking approval as an awarding body, and awarding bodies seeking accreditation of qualifications. Qualifications Scotland Accreditation has designed the Regulatory Requirements to encompass the five key principles of Better Regulation to ensure that we are transparent, accountable, proportionate, consistent and targeted in carrying out our regulatory duties.

There are 18 Regulatory Principles in total, each one defining a standard which awarding bodies must meet. There are also 'Supplementary Information' and 'Guidance Notes' which will assist awarding bodies in meeting the Regulatory Principles.

An awarding body must be in compliance with its Accreditation License throughout its approval. This is agreed to at the beginning of approval and the awarding body must give consideration to this alongside additional regulatory activity and requirements.

Where appropriate, awarding bodies must also meet the requirements of the Regulatory Directives that contain specific obligations that awarding bodies must meet.

It is Qualifications Scotland Accreditation policy that all audit and provider monitoring activity will result in a report to the relevant awarding body highlighting any areas that need to be addressed. These reports will only highlight those areas where issues or recommendations have been identified. However, PMA reports will also highlight areas of good practice as identified by providers.

Audit and provider monitoring reports will contribute to the overall risk rating of awarding bodies. Awarding bodies will be required to demonstrate and provide evidence of any corrective action they have taken to mitigate their risk level.

Qualifications Scotland Accreditation publishes all audit and provider monitoring reports and associated action plans on the Qualifications Scotland Accreditation public website, following approval by the ACG.

4.3 Awarding body risk assessment

Throughout the awarding body approval process, as well as after approval, Qualifications Scotland Accreditation will undertake periodic risk assessment of awarding bodies to ensure their ongoing compliance with the General Approval Requirements, Accreditation Licence and Regulatory Principles and Directives. Any negative outcomes of the risk assessment will be managed between Qualifications Scotland Accreditation and the awarding body and may lead to the application of extraordinary issues or sanctions, applied in line with our Regulatory Sanctions Policy. See 4.6 and 4.7 for further information.

4.4 Audit and provider monitoring strategy

In line with the Scottish Government's Business Regulation agenda, Qualifications Scotland Accreditation follows the five principles of Better Regulation.

As part of the planning of regulatory activities Qualifications Scotland Accreditation Regulation section aims to:

- carry out awarding body audit and provider monitoring activity to ensure compliance and provide regulatory assurances to protect learners, employers, parents, funding bodies and the Scottish Government
- ensure the integrity of accredited qualifications, through objective evaluation of an awarding body's compliance with our Regulatory Requirements
- conduct all regulatory activities in accordance with the principles of Better Regulation — proportionate, accountable, consistent, transparent and targeted
- carry out any relevant activities to ensure the quality and integrity of all Qualifications Scotland Accreditation's accredited qualifications

Qualifications Scotland Accreditation's risk-based approach to quality assurance includes the use of an information management system, our Quality Enhancement Rating Database (QERD).

The QERD helps inform our risk assessment of each awarding body and is used to consider the focus of audit and provider monitoring activity.

4.4.1 Frequency of activity

The frequency of our audit activity is determined by Qualifications Scotland Accreditation's approved Quality Assurance Policy.

Qualifications Scotland Accreditation will conduct quality assurance activity of every approved awarding body by:

- carrying out audits of approved awarding bodies, at least once in a three-year period and where the risk merits the activity
- submission of an annual self-assessment
- conducting PMA of an awarding body's providers on a targeted risk basis

4.4.1.1 Audits

For audits, the three-year cycle is subject to the assigned level of risk. This takes account of the findings of previous audit activity, as well as other factors, including outcomes from PMA.

Based on the overall risk from the QERD, the audit activity cycle will be established on the following scale as part of annual planning activities:

Risk level	Activity
Low	Audit will be carried out within three years
Medium	Audit will be carried out within two years
High	Audit will be carried out annually

Additionally, Qualifications Scotland Accreditation reserves the right to increase the number and frequency of audits in any given three-year period where we perceive that there is significant risk.

This is to ensure effective and economical use of regulatory resources. This approach allows Qualifications Scotland Accreditation to schedule awarding bodies audits on the basis of greatest risk first.

4.4.1.2 Provider monitoring activity

Provider monitoring activity is normally conducted on an annual basis. Overall risk levels for awarding bodies, as determined by the QERD, will be used to allocate resources in a targeted way to ensure effective PMA. This may change the frequency of planned PMA for an individual awarding body, which may see such activity re-scheduled to the following year.

Both audit and PMA will evaluate an awarding body's level of compliance with Qualifications Scotland Accreditation's Regulatory Requirements.

4.5 Planning for audits and provider monitoring activity

Qualifications Scotland Accreditation's Regulation Section will meet annually to determine the audit schedule for the following financial year (April to March). The following factors from the QERD will be taken into account when considering which awarding bodies and providers will be selected for audit:

- overall awarding body risk rating (the weighted total of all open issues, classed as low, medium or high)
- last audit date
- last provider monitoring visit date and issues recorded
- number of providers approved by the awarding body
- qualification delivery of the awarding body
- any scoped reviews that need to be undertaken
- complaints
- allegations of malpractice and maladministration
- poor quality accreditation submissions
- new awarding bodies

All of these factors will allow Regulation to agree priorities for the next audit and provider monitoring schedules.

The Regulation section will also determine a proposed visit month for the audit of the awarding body, and an anticipated month for provider monitoring visits.

Audits will be confirmed through agreement with the awarding body.

PMA will be arranged directly with approved active providers as supplied bi-annually by the awarding body. This will be arranged without awarding body knowledge. Providers are kept anonymous throughout the process, except in cases of malpractice and maladministration.

4.5.1 Reporting

All audit and provider monitoring reporting and associated action plans are subject to approval by ACG, which will ratify the outcome of the regulatory activity.

To maintain an open and transparent approach to regulation, Qualifications Scotland Accreditation publicly reports its regulatory activities on its website and, where appropriate, requires awarding bodies to take responsibility to resolve issues that do not meet our Regulatory Requirements.

4.5.2 Recording

All regulatory related activity will be recorded and closed out on the Qualifications Scotland Accreditation QERD.

The QERD will be used to monitor and evaluate regulatory activities and identify potential areas for future regulatory activity.

4.6 Extraordinary Issues

Outside of normal regulatory activity, at any point during the lifetime of awarding body approved status, Qualifications Scotland Accreditation may apply an extraordinary issue that needs to be addressed. This will be where a perceived risk or issue may need monitoring to ensure the integrity of accredited qualifications, or to protect the interests of learners, employers, parents, funding bodies, government and end-users of services.

4.7 Sanctions

Qualifications Scotland Accreditation has the power to apply sanctions in line with our Regulatory Sanctions Policy. As the regulator we need to ensure that all approved awarding bodies conform to all of our requirements to ensure the integrity of accredited qualifications and to protect the interests of learners, employers, parents, funding bodies, government and end-users of services.

Where an awarding body fails to meet our requirements, a Regulatory Warning letter may be sent before formal sanctions are imposed. This would be determined based upon the seriousness and perceived level of risk of the issue.

ACG may also consider imposing ad-hoc compliance activities or actions on awarding bodies, as an interim step before formally placing a sanction upon the awarding body.

Where a formal sanction is deemed necessary Qualifications Scotland Accreditation can apply three Regulatory Sanctions:

- **Category 1 Regulatory Sanction** — suspension of qualification accreditation
- **Category 2 Regulatory Sanction** — withdrawal of qualification accreditation
- **Category 3 Regulatory Sanction** — removal of approved awarding body status

5. Awarding body activities

To meet our Regulatory Requirements, approved awarding bodies are responsible for providing Qualifications Scotland Accreditation with information on their processes, procedures and qualifications.

5.1 Provider lists

Awarding bodies are required to upload a provider list to their dedicated SharePoint site, listing all active providers delivering accredited qualifications, the specific qualifications and registration and certification numbers. This should be uploaded bi-annually, generally in January and July.

5.2 Self-assessment

Qualifications Scotland Accreditation encourages all awarding bodies to foster a culture of continuous improvement. To this end, over and above our audit and PMA strategy, we require all awarding bodies to submit an annual self-assessment. These self-assessments are reviewed by both the Accreditation and Regulation sections, and feedback is given to the awarding body within 30 working days, highlighting whether there are any concerns.

5.3 Data returns

All approved awarding bodies are required to submit data returns to Qualifications Scotland Accreditation quarterly. Using the template supplied on our website, the awarding bodies provide a list of all accredited qualifications and the total number of candidate registrations and certifications.

The schedule for data returns is:

Quarter	Submission deadline
Quarter 1 (1 April–30 June)	12 July
Quarter 2 (1 July–30 September)	14 October
Quarter 3 (1 October–31 December)	14 January
Quarter 4 (1 January–31 March)	14 April

This data helps Qualifications Scotland Accreditation to ensure that qualification uptake remains sufficient to ensure continued accreditation of qualifications, as well as to satisfy itself that there is activity to demonstrate ongoing compliance

with our Regulatory Requirements. Qualifications with no candidate activity will be monitored and may be withdrawn, in accordance with our Zero Uptake Policy.

6. Withdrawal of awarding body approval

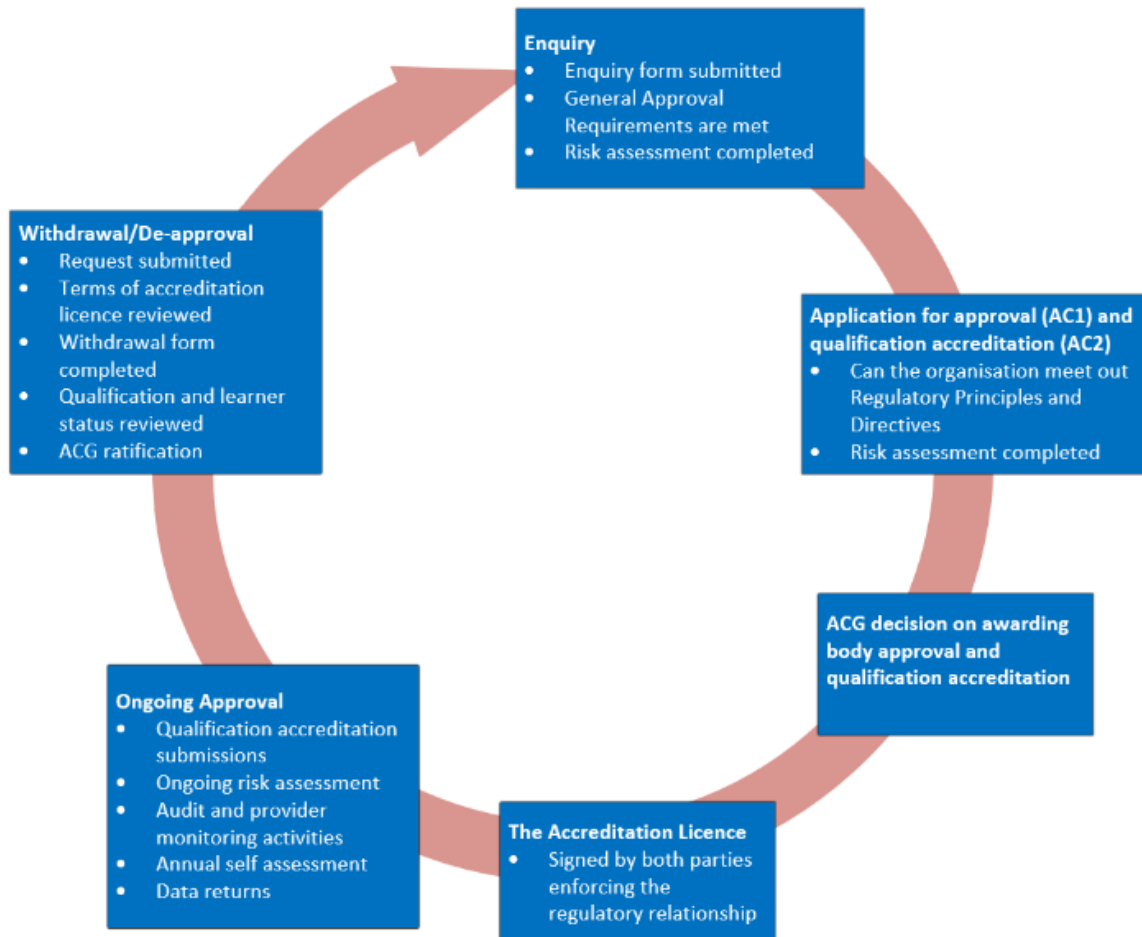
Any decision to withdraw approval from an awarding body should consider the following:

- Accreditation Licence
- status of all qualifications currently accredited by Qualifications Scotland Accreditation and being offered by the awarding body (live / due to lapse)
- number of candidates registered or due to be certificated on the qualifications

The general process for withdrawal of approval status is:

- 1 The awarding body should be advised to complete and submit an AC2 form to formally withdraw all qualifications, and this will be brought to ACG by the accreditation manager for a decision.
- 2 The regulation manager will also bring a paper to ACG outlining the reasons that the awarding body has set out for withdrawing.
- 3 ACG will decide the next steps and set a withdrawal date within the 18-month period set out within the Accreditation Licence. In practice, however, the withdrawal date will tend to be the same as the date that the qualifications are withdrawn (if there is zero uptake), all other factors considered.
- 4 Once the withdrawal date has been confirmed this will be logged in the QERD.

7. Overview of lifecycle of awarding body approval



8. Our policies and documents

This framework should be read in conjunction with other relevant Qualifications Scotland Accreditation policies and documents that are updated as necessary to meet Qualifications Scotland Accreditation's business needs and legal obligations. All policies are available on Qualifications Scotland Accreditation's website.

Relevant policies:

Awarding Body Approval Policy

Regulatory Sanctions Policy

Quality Assurance of Approved Awarding Bodies Policy

Zero Uptake Policy

Appeals Process

Relevant documents:

General Approval Requirements

Regulatory Principles

Regulatory Principles Guidance Notes

Accreditation License

Footnote References

i <https://www.gov.scot/policies/supporting-business/business-regulation/>

ii <https://www.gov.scot/publications/scottish-regulators-strategic-code-of-practice/>

iii <https://nationalperformance.gov.scot/>

iv <https://nationalperformance.gov.scot/national-outcomes>

v https://www.legislation.gov.uk/asp/2025/11/pdfs/asp_20250011_en.pdf