

Briefing paper: Functions of the SCQF Partnership and the Education (Scotland) Bill

Summary

This paper outlines the key quality assurance functions of the Scottish Credit and Qualifications Framework and its governance and considers the implications of some of the Stage 2 Education (Scotland) Bill proposed amendments relating to the SCQF. It specifically outlines the relationship between SQA (and its successor body) and the SCQF Partnership and the merit of retaining independent oversight of Credit Rating Bodies (CRBs) credit rating functions as they relate to the SCQF's quality and integrity.

Introduction

The Scottish Credit and Qualifications Framework (SCQF) is Scotland's Lifelong Learning Framework. The SCQF is a descriptive and integrating Framework which enables comparability of all SCQF credit-rated qualifications, which must meet the four essential criteria for inclusion¹. 'Credit rating' refers to making a formal decision about the level and credit value of a qualification or learning programme using SCQF criteria and Guidelines. Only credit rating bodies – a body approved by SCQF Partnership as having met robust criteria and which can credit rate - are permitted to carry out this process, which is underpinned by a set of 25 SCQF Principles.

The Framework was developed as a collective vision by government, Quality Assurance Agency (UK body), SQA, Universities Scotland and Colleges in Scotland. Assurance that all qualifications and learning programmes on the SCQF have been credit rated following SCQF principles and provide a rationale for the allocation of level and credit points, is provided by SCQF Partnership's monitoring and review of the credit rating practices of Scotland's 53 credit rating bodies.

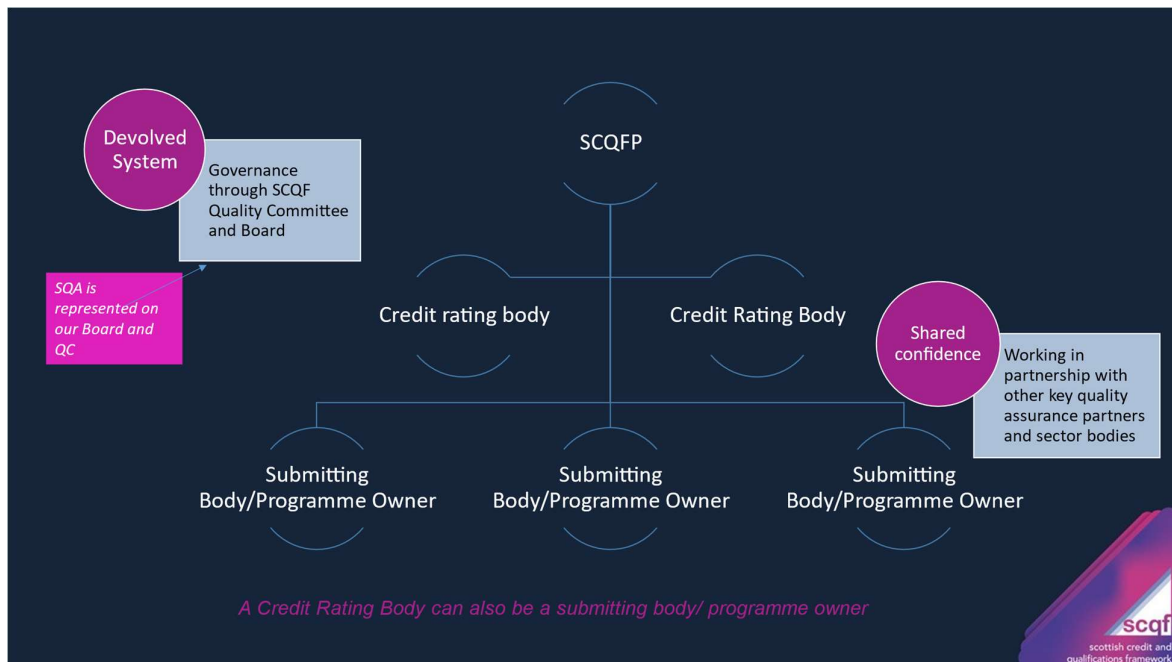
A devolved system for credit rating of qualifications

Credit Rating Bodies (CRBs) are responsible for assigning Level and Credit to qualifications they wish to place on the SCQF, which they may have devised themselves or may be credit-rating on behalf of third parties. They must follow the Quality Assurance processes developed by SCQFP and are supported in this activity with a series of tools and resources available on the Partnership's website. The organisations and bodies able to credit rate in Scotland (CRBs):

- All universities,
- All colleges (although much of their provision is through the delivery of SQA vocational qualifications)
- SQA Awarding

¹ the 4 criteria are: 1/ clear learning outcomes; 2/ a minimum of 10 notional learning hours; 3/ formal assessment that is recorded and 4/ internal and external quality assurance

- SQA Accreditation
- SQA's credit rating service (for external organisations)
- 7 other professional/ sector specific organisations (these include the Scottish Police College, Opito (provider of oil and gas industry training) and the Chartered Bankers Institute).



There are currently around 9,600 learning programmes on the SCQF, including the qualifications of SQA Awarding, SQA Crediting Rating Service and Accreditation. The 3 CRBs under SQA auspices account for approximately 29% of all programmes on the SCQF Register with SQA Credit Rating Service accounting for around 72% of all third-party credit rating activity.

How does learning get on the SCQF?

Process of Credit Rating:

- A consistent process
- One set of guidance used by all Credit Rating Bodies

What do they credit rate?

Their own provision offered in schools, colleges and universities, within their own organisations and training centres

Some can also credit rate:

“Third party” provision owned, developed and awarded by others e.g employers; certificating bodies; professional bodies; voluntary and community organisations

Credit Rating Bodies:

- Higher Education Institutions
- Further Education Colleges
- Scottish Qualifications Authority (SQA)
- Chartered Institute of Bankers in Scotland
- Scottish Police College – Tulliallan
- ICAS (Institute of Chartered Accountants of Scotland)
- Scottish Fire & Rescue Service – TED
- Scottish Prison Service College
- Opito (oil and gas sector)
- EduQual
- **NOT** the SCQF Partnership

Management and governance of the SCQF

The SCQF is managed by the SCQF Partnership, a company limited by guarantee and a registered charity in Scotland. The SCQF Partnership is governed by a Board of Directors which has an independent Chair and comprises senior representatives from the member organisations which are:

- The Quality Assurance Agency for Higher Education Scotland;
- Scottish Qualifications Authority;
- Universities Scotland;
- Scottish Ministers; and
- Scotland's Colleges.

The Board also has 4 co-opted Directors who represent employers, local government and other sectoral interests. The Board approves the recommendations of its Quality Committee.

Quality assurance of the SCQF

The SCQF Partnership has a Quality Committee (which includes representatives from across the education and skills system, including SQA Awarding and Accreditation, as well as SDS, Education Scotland/HMle) which is tasked with ensuring that the quality and integrity of the Framework is maintained. It scrutinises SCQF officers' quality oversight of credit rating activity, which focuses on the credit rating processes developed to allocate SCQF level and credit together with the associated quality assurance systems and the capacity and commitment of the credit rating body. SCQFP does not review the delivery of the learning itself.

Through operation of SCQF's Quality Assurance Model, Approved CRB credit rating provides a standard approach to the measurement of the result of learning wherever, whenever, and however it has been achieved.

Decisions by the Credit Rating Body must be based on sound evidence supported by internal and external review.

Universities and Colleges

Under the new Tertiary Quality Enhancement Review method introduced by the Scottish Funding Council, quality assurance is provided on tertiary institutions' credit rating activity by QAA, with the SCQFP providing expert opinion as part of the review cycle. If, following a review, there are significant matters remaining regarding credit rating activity, the report will include recommendations and stipulate that the institution should liaise with SCQFP in respect of their action planning. Where there are negative review judgements relating to credit rating this will be considered by SCQFP Quality Committee and may result in the suspension of some credit rating activities. SCQFP will still reserve the right to investigate matters of concern about an institution outside of the review cycle.

Approved Credit-rating bodies

The SCQFP directly assures the consistency of credit rating process for Approved CRBs, with reports being scrutinised and recommended for approval by the SCQFP Quality Committee and the SCQF Board.

Scottish Qualifications Authority

SQA is currently responsible for assuring the quality of its own three CRBs: SQA Awarding, SQA Accreditation and SQA Credit Rating Service.

SCQF Partnership understands that SQA previously established an independent process of scrutiny for its own 3 CRBs, but there was no formal reporting mechanism established for this

process to alert SCQFP to any areas of concern. It is anticipated that this will be agreed with the new body Qualifications Scotland.

Given the changes that may be introduced within the Education (Scotland) Bill, it would be useful for the role of SQA as a CRB (or multiple CRBs) to be included in any new arrangements, and to ensure that this is aligned to the SCQFP and the Quality Committee for shared confidence. At present, the Accreditation Unit functions do not extend to scrutiny of SQA Awarding or SQA Credit-rating Service functions because it does not constitute regulated provision and are CRBs in their own right, which would require significant additional resource. SQA Accreditation is the only organisation that can credit rate SVQs. It also has a mandate from Scottish Government to credit rate qualifications voluntarily submitted for accreditation, provided that the qualification can be credit rated.

Functions determining form: The role of Accreditation Unit and the role of SCQFP

The Cabinet Secretary has provided a detailed briefing to the Education, Children and Young People Committee on [the role of accreditation](#), for which the Scottish Ministers are proposing a statutory review as part of Stage 2 amendments.

The Accreditation Unit or the 'Regulator' currently performs several functions, underpinned by its regulatory principles:

- Approval of awarding bodies that wish to have their qualifications accredited. SQA Accreditation has been mandated by certain organisations to accredit particular qualifications, this includes SVQs and qualifications in the licencing and security sectors. All other qualifications are submitted on a voluntary basis.
- Accreditation of qualifications: once an awarding body has been approved, it can submit any qualification, other than a degree, for accreditation.
- Credit rating all qualifications submitted for accreditation provided that the qualification can be credit rated. SQA Accreditation is also the credit rating body for Modern Apprenticeships. These are approved by the Accreditation Co-ordination Group;
- Conducting regulatory activity which includes the auditing of awarding bodies, and sampling visits to each awarding body's approved providers. Regulatory activity can also include carrying out investigations when required.

The SCQFP is responsible for approving Approved credit rating bodies, quality assurance monitoring and review of the consistent application of credit rating processes delivered by CRBs; it *does not* credit rate any qualifications itself, nor was ever intended to do so due to the devolved nature of the agreed system for credit rating. This has enabled agility and innovation in the breadth of qualifications and learning pathways available to learners in Scotland, whilst ensuring the independence of SCQFP as an oversight body.

Location of Accreditation Unit

There are several options being proposed in Stage 2 amendments for the location of the Accreditation Unit within a reformed education and qualification system, which propose removing the functions of accreditation from those of new Qualifications Scotland.

There are important consequences that should be considered in proposed amendments to the form of Accreditation and the bodies which it has been proposed may absorb these functions (the body which it is proposed would absorb these functions).

These relate to:

- Conflict of interest in the functions of the agency/ body absorbing the functions
- The intended functions of that body
- Legal form of that body

Absorbing the functions of Accreditation into the SCQF Partnership

- Conflict of interest or 'marking your own homework'

The SCQF Partnership, as described above, is responsible for the setting and monitoring of standards for the credit rating processes of all Credit Rating Bodies. It does not undertake credit rating itself. The Accreditation unit is one such CRB. If SCQFP was to absorb this function, it would become a Credit Rating Body itself and be both setting standards and delivering them, a clear conflict of interest.

- Changing the functions of SCQF Partnership

The SCQFP's functions do not extend to approving awarding bodies to deliver and award qualifications. This is a function for CRBs in deciding who they give authority to for the delivery of their own qualifications. SQA Accreditation does this in relation to² any awarding body that wishes to have qualifications accredited.

SCQF Partnership would lose its independent oversight and could be perceived as taking an automatically 'lighter touch' approach to scrutiny of its own credit rating activity, compared to that of the other CRBs which it approves, monitors and reviews.

- Legal

SCQF Partnership is currently an independent not-for-profit company and registered charity which does not take its direction from Scottish Ministers, although works with Scottish Government, in the delivery of the funding priorities set by Ministers for its grant each year. Scottish Ministers may appoint a member to the SCQFP's board but have chosen not to do so since 2011, due to a perceived conflict with the government's role as a funder of the Partnership's activities. The SCQFP is also funded by the Scottish Funding Council, together with raising other commercial income from its activities.

The independence of the Partnership has been consistently defended as being in the best interests of learners, employers and educational institutions and has enabled representative bodies, such as Universities Scotland, the members of which do not take direction from Scottish Ministers, to participate in its governance. Careful consideration of the legal form of the Partnership would be required to safeguard the independence and cross-sectoral nature of its role in the Scottish education and qualifications system.

Other considerations

There has also been public discourse on the extension of Accreditation's regulatory powers to include all qualifications funded through the public purse. This is a policy issue for government and SQA/its successor and not for SCQF Partnership. However, we would encourage any future deliberations on this issue to focus on addressing only evidenced risks within the current qualifications system in Scotland, not least due to the current fiscal operating environment.

² *At the end of 2024 - 2025, we had 348 live SVQs and 344 live non-SVQs. Most of the 344 non-SVQs have been submitted on a voluntary basis.*

The Partnership board has confidence in the current system and processes in place for ensuring robust credit rating practice, delivered through our CRBs but would welcome the opportunity to embed Shared confidence mechanisms as part of the new Qualification Scotland's partnership arrangements.