IQ Calls for Training and Assessment Controls in the UK Security Industry to be Strengthened

Introduction

This paper has been written to stimulate discussion and thinking on improvements that can be made to training and assessment practices for licensed qualifications in the UK security industry. It has been produced following reports of malpractice in several security training centres, which are understood to be working with a number of awarding organisations. In making its proposal, IQ recognises that most of the training and assessment in the sector is to a good or high standard, but it is widely acknowledged that assessment in the security sector is high risk, and malpractice is perhaps more widespread than has been publicly recognised.

Background

Training and assessment is undertaken by training departments of security companies, and through private training providers. In relation to the training provider market in particular, there are a number of issues as follows:-

- As a regulated sector, there is an attraction for training providers to enter the market, due to the perception of regular and ongoing business. Entry barriers for training companies are currently extremely low.
- The sector suffers from over-supply of training provision, leading to aggressive cost cutting and pressure on centres to demonstrate high achievement rates.
- Security education is used as a vehicle for return to work and employment schemes, attracting students ranging from those interested in working in the industry, to those who are not. When combined with payment by results, the risks increase.
- Cost pressure on centres impacts upon awarding organisations wishing to go beyond established norms in pursuit of effective quality assurance.

These, and other factors combine to make the security sector a high risk sector for awarding organisations.

Industry Qualifications (IQ) has been engaged in internal review since the autumn of 2014, considering how it might effectively manage the risk of malpractice in the security sector in terms of both training and assessment. Much of the early focus has been on the development of the IQ External Verification
team as auditors for the risk assessment standard (ISO31000) to broaden their understanding of risk, outside of the narrow context of external verification as defined by the Joint Awarding Body Guidance.

The nature of some malpractice is such that it is doubtful whether the common approach of awarding organisations, and the regulatory framework within which it is discharged, is sufficiently robust. IQ is confident that it applies and usually exceeds the JAB guidance, but recognise that there are limitations in the effectiveness of quality assurance where a centre is minded to commit systemic fraud.

The purpose of this paper is to encourage a wider review, identify those adjustments and enhancements that can be made to reduce the risk of malpractice and fraud.

Proposals

The proposals that IQ believe should be adopted broadly fit within three categories:-

1. The licensing of those involved in training and assessment
2. The collection and sharing of data across awarding organisations
3. A review to ensure that external verification is responsive to social, economic and cultural diversity.

Licensing

Training and assessment tends to be undertaken within security companies, or is provided by educational providers, some of which have strong links with the industry, and others not.

Currently, under the provision of the Private Security Industry Act (2001), there is no requirement for trainers, invigilators or directors of training companies to hold an SIA license. Where the training centre is a security company, it is more usual for training staff to have an industry license. No provision exists for the licensing of trainers.

The IQ position is that:-

1. That a new category of license be developed by the SIA for trainers. Trainers would continue to require to be qualified in training delivery and have appropriate sector competence, but in addition they will be required to apply for a license. This process would enable a CRB check to be undertaken, which is currently not the case across all training providers. Most importantly, it would allow for the license to be revoked should malpractice or fraud be uncovered.
2. That owners and directors of training companies are also required to hold a non-front line license, which will enable suitable checks to be undertaken on whether they are fit and proper
persons. Again, revocation of a license on the grounds of malpractice or fraud would remove offenders from the industry.

3. IQ believes that there is a strong argument in general, and not specific to the security industry, for trainers to be registered and for trainers to be removed from that register in the case of malpractice or criminal/inappropriate activity.

The licensing of trainers and directors/owners of training companies, will significantly reduce the potential for fraud by increasing the cost of entry, and the risk to the individuals and organisations concerned if they behave in a fraudulent manner.

Sharing of data

Ofqual currently require awarding organisations to inform other awarding organisation operating in a sector when a centre has had its recognition withdrawn. The reasons for withdrawal of recognition range from malpractice, to non-payment of bills and more minor issues. Other awarding organisations then make a judgement on whether they wish to recognise the centre concerned, and should take into account the evidence provided by the reporting awarding organisation.

The system provides reasonable real time intelligence, but it is not possible to review whether a centre, or the directors involved in the operation of a centre, have historically been reported by another awarding organisation. This means that a rich source of risk based data, is not available to awarding organisations when they are making decisions about the approval of a centre.

The proposal from IQ is that Qualification Regulators consider maintaining an historical record of centres and directors that have been the subject of malpractice investigations that have uncovered malpractice.

External Verification

Quality assurance within centres is largely monitored through:-

- Centre approval
- External verification
- Assessment monitoring (checking examination scripts statistically and in terms of how they have been completed)
- Whistle blowing

It is the view of IQ that the following actions need to be taken across all awarding organisations, irrespective of what those awarding organisations choose to add to the quality assurance process:-
1. All centres should be subject to a centre approval visit prior to approval. Whilst this is the case for IQ centres, there is some evidence to suggest it is not uniformly observed across all awarding organisations.

2. That awarding organisations maintain statistical data on attendance rates at examinations. The backgrounds and motivations for those attending licensed security programmes is varied, and lifestyles can be chaotic. This results in large numbers of candidates not showing up for training/assessment. We believe that this provides an opportunity to hide fraudulent activity. By maintaining average attendance rates for centres, if there are significant swings in attendance, particularly during an unannounced centre approval visit, it could be highlighted as a risk factor worthy of additional investigation.

A further part of the proposal relates to the need for an evidence based study, to understand whether activities such as whistle blowing are as effective in certain communities or economic and social strata. There is some empirical evidence that malpractice tends to be geographically concentrated. Research is required to understand the reason for this. In particular:

- Whistle blowing, which is probably the most useful tool in the uncovering of deliberate fraud, might not be a norm within all parts of society?
- Do awarding organisations need to look at social, cultural, economic of ethnic diversity within the composition of deployment of external verification teams?

We recognise that these issues will need to be considered with respect, sensitivity and honesty. The view of IQ is that it is a consideration worthy of review.

In addition to these proposals, IQ will continue to work with centres and key partners to enhance our own approach to quality assurance, building upon the capability and reputation that we have developed to date.

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