SMART AWARDS – EXTERNAL QUALITY ASSURANCE (EQA) STRATEGY

SMART AWARDS
Awarding Platform for Smart Qualifications

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Unit F8A | Holly Farm Business Park | Honiley Road | Kenilworth | CV8 1NP
T: 02476 421125
E: info@smartawards.co.uk
W: www.smartawards.co.uk

Company Number 9079735 | VAT Number 216 7632 08

1. PURPOSE OF THIS STRATEGY

1.1 The Smart Awards External Quality Assurance (EQA) Strategy defines the systems, controls and principles used to ensure that all qualifications are delivered and assessed in accordance with:

- Ofqual General Conditions of Recognition
- Qualifications Scotland Accreditation (QSA) regulatory principles
- Smart Awards policies and procedures

1.2 This strategy ensures:

- The validity, reliability and comparability of assessment decisions
- The consistent application of national standards across centres
- The effective identification and management of risk
- The integrity and credibility of certification
- Confidence from learners, employers and regulators

1.3 This strategy forms part of the Smart Awards Quality Assurance Framework and applies to all approved centres.

2. AIMS OF EXTERNAL QUALITY ASSURANCE

2.1 The EQA function ensures that Smart Awards:

- Confirms centres are delivering qualifications in line with regulatory and organisational requirements
- Ensures assessment decisions are valid, reliable, fair and consistent
- Monitors the effectiveness of internal quality assurance (IQA) and internal verification systems
- Applies a risk-based approach to quality assurance activity
- Supports centres through guidance, standardisation and continuous improvement
- Ensures qualifications remain credible, comparable and fit for purpose
- Monitors delivery environments, including practical and safety-critical settings

3. EXTERNAL QUALITY ASSURERS (EQAs)

3.1 Smart Awards shall ensure that all External Quality Assurers ("EQAs") appointed to undertake external quality assurance activities are appropriately qualified, competent and authorised to perform their role.

3.2 EQAs must:

a) Hold relevant and current occupational competence in the subject area(s) they quality assure and possess an appropriate external quality assurance qualification or be actively working towards such a qualification within an agreed timeframe.

b) Maintain up-to-date continuing professional development ("CPD") relevant to both their occupational sector(s) and quality assurance practice.

c) Undertake external quality assurance activities in accordance with Smart Awards' risk-based quality assurance model, including both scheduled and responsive interventions.

d) Sample, as required, assessment decisions, learner evidence and internal quality assurance ("IQA") activity to determine the validity, reliability and consistency of assessment.

e) Review additional evidence relating to centre systems, processes and controls where necessary to ensure compliance with Smart Awards requirements.

f) Produce accurate and complete EQA reports, including actions and risk ratings, within the prescribed timescales.

g) Provide objective, evidence-based feedback to centres and, where appropriate, make recommendations for improvement.

h) Immediately escalate any concerns relating to non-compliance, maladministration, malpractice or risks to the integrity of assessment or certification in accordance with Smart Awards procedures.

4. SMART AWARDS QUALITY TEAM

4.1 Smart Awards shall maintain a central Quality Assurance Team ("Quality Team") with overall responsibility for the governance, oversight and effectiveness of the external quality assurance system.

4.2 The Quality Team shall:
(a) Monitor the performance, consistency and standardisation of EQAs to ensure the effective and consistent application of quality assurance processes.

(b) Review and validate centre risk ratings, sampling strategies and EQA decisions to ensure alignment with Smart Awards' risk-based approach.

(c) Oversee the implementation and completion of action plans, the application of sanctions, and the categorisation of centres based on risk and performance.

(d) Ensure that all EQA activities are conducted in compliance with applicable regulatory requirements, including those set by Ofqual and Qualifications Scotland Accreditation.

(e) Investigate and respond to escalated issues, including cases of suspected or confirmed malpractice and maladministration, in accordance with Smart Awards policies and regulatory obligations.

5. EQA CODE OF CONDUCT (IMPARTIALITY AND INDEPENDENCE)

5.1 Smart Awards shall ensure that all EQA activity is conducted with integrity, impartiality and independence.

5.2 EQAs must not:
a) Undertake external quality assurance activity in respect of any learner, assessment, portfolio or centre where they have previously been involved in training, assessing or internally quality assuring that learner or provision.

b) Engage in any activity where a personal, financial or organisational conflict of interest exists, or may reasonably be perceived to exist, in relation to the centre, its staff, or its learners.

5.3 EQAs must.
a) Declare any actual, potential or perceived conflicts of interest prior to undertaking any EQA activity.

b) Comply with any measures implemented by Smart Awards to manage or mitigate declared conflicts, including reassignment of activity where necessary.

c) Maintain professional independence and objectivity at all times and must not influence, direct or alter assessment decisions made by centre staff.

5.4 Smart Awards shall maintain appropriate records of declared conflicts of interest and actions taken to ensure ongoing compliance with regulatory requirements.

6. CENTRE RISK RATING

6.1 Risk ratings are based on:

- Previous EQA/verification outcomes
- Centre compliance and administrative accuracy
- Staff competence and turnover
- Assessment consistency and quality
- History of malpractice or sanctions
- Qualification type and delivery risk (e.g. safety-critical areas)

6.2 New centres are classified as High Risk until compliance is demonstrated.

6.3 Risk Categories

Risk Level	Description
Low	Consistently meets requirements with minor improvements
Medium	Some inconsistencies or compliance issues
High	Significant risks to assessment integrity or compliance

6.4 Audit Allocation Model

Risk Level	Remote	Onsite
Low	0	1
Medium	1	1
High	2	1

6.5 This ensures proportionate, risk-based monitoring aligned to both regulators.

6.6 Centre risk ratings are reviewed following EQA activity or where new concerns arise. Any changes are recommended by the EQA, approved by the Quality Team and recorded with supporting rationale. Monitoring arrangements are adjusted accordingly.

6.7 Smart Awards recognises that individual qualifications or assessment methods may present additional risks, regardless of the centre's overall risk rating. Where identified, proportionate additional monitoring or sampling may be undertaken, with scrutiny of centre-marked assessments managed in accordance with the CASS Strategy.

7. EQA AUDIT FREQUENCY

7.1 For the purposes of this Strategy, the term "audit" shall refer to a structured External Quality Assurance ("EQA") activity, which may be conducted either remotely or onsite.

7.2 Smart Awards shall ensure that each approved centre is subject to a minimum of one onsite audit within each annual quality assurance cycle.

7.3 The onsite audit shall include, but not be limited to, the following activities:

a) Observation of assessment practice, including Smart Awards qualifications and, where applicable, Street Works (SWQR) delivery.

b) Review of physical resources, assessment environments and compliance with relevant health and safety requirements.

c) Inspection of equipment, including any simulation or practical assessment conditions.
d) Review of centre policies, procedures and supporting documentation.

e) Verification of learner registration and certification processes.

f) Sampling of assessment decisions and internal quality assurance ("IQA") records.

g) Review of centre action plans, governance arrangements and management controls.

h) Confirmation of assessor competence, qualifications and occupational currency.

7.4 Where a centre delivers Street Works qualifications, Smart Awards shall, where reasonably practicable, incorporate Street Works observation within the same onsite audit visit. Where this is not practicable due to scheduling or operational constraints, Smart Awards reserves the right to conduct a separate visit.

7.5 **New Centres:** All newly approved centres shall be classified as high risk and shall be subject to enhanced EQA monitoring.

7.6 Such monitoring for new centres shall include:
- Two remote audits
- One onsite audit.

7.7 Smart Awards may, at its discretion, treat the centre approval audit as fulfilling the requirement for the onsite audit.

7.8 Where a centre has not registered any learners, Smart Awards reserves the right not to conduct an onsite audit until such time as delivery activity has commenced.

7.9 **Additional Audits:** Smart Awards reserves the right to conduct additional EQA activity where it is deemed necessary based on risk, compliance concerns or regulatory requirements.

7.10 Additional monitoring activity may include, but is not limited to:
- Additional remote audit
- Additional onsite audit
- Unannounced visits.

7.11 Such additional activity shall be proportionate to the level of risk identified and may be applied following EQA findings, complaints, investigations or failure to comply with required actions.

8. EQA SAMPLING STRATEGY

8.1 Smart Awards shall implement a structured and documented External Quality Assurance ("EQA") sampling strategy to ensure the validity, reliability and consistency of assessment decisions.

8.2 EQA sampling shall, as a minimum, apply to the following:
- Assessment decisions

- Learner evidence
- Internal Quality Assurance ("IQA") records and activity
- Assessor competence, qualifications and occupational currency
- Centre policies, procedures and supporting documentation
- Delivery and assessment environments, including practical and simulated settings where applicable.

8.3 **Sampling Model:** Smart Awards shall adopt a blended sampling model to ensure that assessment decisions are subject to appropriate scrutiny and verification.

8.4 The sampling model shall include:

a) Risk-based sampling, which shall form the primary approach and be informed by the centre's risk rating and previous EQA outcomes.

b) Stratified sampling across a representative range of assessors, units, qualification types, locations and assessment methods.

c) Random sampling to ensure objectivity and to protect the integrity of the assessment process.

8.5 Where a centre delivers both Street Works qualifications and other Smart Awards qualifications, the EQA sampling strategy shall include a proportionate and representative sample from each qualification type to ensure the accuracy and consistency of assessment decisions across all areas of delivery.

8.6 **Sampling of High-Risk Areas:** Smart Awards shall apply enhanced and targeted sampling where increased risk to the integrity of assessment is identified.

8.7 Enhanced sampling shall be applied, but shall not be limited, to the following circumstances:

a) Newly approved centres.

b) Newly appointed assessors, including those who are unqualified or recently qualified.

c) Safety-critical practical assessments, including but not limited to confined spaces, working at height, excavation, or fire stopping activities.

d) Centres or assessors where previous EQA activity has identified inconsistent, borderline or unreliable assessment decisions.

8.8 EQA sampling shall include a representative spread of learner performance, including high-performing, borderline and typical learners.

8.9 Under no circumstances shall sampling be restricted solely to high-performing learners, pre-selected portfolios, or evidence chosen by the centre for the purpose of demonstrating compliance.

8.10 Smart Awards reserves the right to expand the scope and volume of sampling where necessary to ensure the validity, reliability and integrity of assessment decisions.

8.11 Where assessments are marked by centres, Smart Awards shall undertake additional scrutiny in accordance with its Centre Assessment Standards Scrutiny (CASS) Strategy. This includes risk-based scrutiny of assessment decisions, moderation where applicable, and monitoring the accuracy and consistency of centre marking.

9. EQA ACTIVITIES

9.1 **Centre Approval Audits:** Smart Awards shall undertake a Centre Approval Audit prior to, or at the commencement of, qualification delivery to determine whether a centre is suitably equipped and resourced to deliver and assess Smart Awards qualifications.

9.2 The Centre Approval Audit shall include, but not be limited to, verification of the following:

a) Governance arrangements and organisational structure.

b) Availability and suitability of resources, including staffing levels and the competence of assessors and internal quality assurers ("IQAs").

c) Delivery and assessment environments, including facilities for practical and simulated assessment where applicable.

d) Compliance with relevant health and safety requirements.

e) Centre policies, procedures and quality assurance systems.

f) Eligibility for, and appropriateness of, Direct Claim Status ("DCS"), where applicable.

9.3 Approval shall only be granted where Smart Awards is satisfied that the centre meets all required conditions for delivery and assessment.

9.4 Scheduled Monitoring Visits: Smart Awards shall conduct scheduled monitoring activity to ensure ongoing compliance with regulatory and organisational requirements.

9.5 Each approved centre shall receive a minimum of one onsite audit per year as part of the standard EQA cycle.

9.6 Additional monitoring visits shall be scheduled where:

- A centre is classified as Medium or High risk; or
- Concerns are identified relating to compliance, assessment practice, or delivery.

9.7 **Remote Monitoring Audits:** Remote audits may be conducted where appropriate and shall focus on the review of documentation, systems and records.

9.8 Remote monitoring may include, but shall not be limited to:

- Review of learner evidence
- Sampling of assessment decisions
- Review of IQA activity, planning and records
- Verification of assessor and IQA CPD, qualifications and occupational competence
- Review of administrative processes, including learner registration, certification and associated documentation.

9.9 **Onsite Audits:** Onsite audits shall be conducted where direct observation and verification are required.

9.10 Onsite audits shall include all elements of a remote audit and, in addition, shall include:

- Observation of live assessment practice.
- Observation of practical and/or safety-critical assessment activities.

- Inspection of centre resources, equipment and physical learning and assessment environments.
- Confirmation of assessor competence in live assessment conditions.

9.11 **Unannounced Visits:** Smart Awards reserves the right to conduct unannounced EQA visits in addition to scheduled monitoring activity where it is deemed necessary based on risk.

9.12 Unannounced visits may be conducted remotely or onsite; however, onsite activity shall be prioritised where concerns relate to practical or safety-critical assessment.

9.13 Unannounced visits may be triggered by, but are not limited to:
- Concerns identified through EQA monitoring activity
- Complaints, allegations or whistleblowing
- Indicators of malpractice or maladministration
- Risks associated with workplace-based, practical or safety-critical assessment
- Inconsistent or unreliable assessment decisions or assessor performance
- Significant concerns arising from remote audit findings
- Newly approved or inexperienced centres where additional assurance is required.

9.14 Unannounced visits shall not form part of the core annual audit entitlement and shall only be undertaken where justified by identified risk.

9.15 **Certification Release Controls:** Smart Awards shall ensure that certification is only issued where assessment and quality assurance requirements have been met. Centres without Direct Claim Status (DCS) shall be subject to EQA approval prior to certification, in accordance with Smart Awards' certification procedures.

9.16 Centres with approved DCS may claim certificates directly through Quartz without individual EQA approval, subject to ongoing EQA monitoring and sampling. Smart Awards reserves the right to suspend DCS or withhold certification where concerns arise regarding assessment integrity, centre compliance or the effectiveness of internal quality assurance.

9.17 EQAs shall submit completed reports, including findings, actions and risk ratings, within ten (10) working days of the EQA activity.

9.18 Centres shall respond to all required actions within the timescales specified by Smart Awards and provide evidence of completion as required.

10. ACTION PLANNING AND SANCTIONS

10.1 **Action Plans:** Smart Awards shall issue an action plan where non-compliance is identified through External Quality Assurance ("EQA") activity.

10.2 An action plan shall be issued following the completion of the audit, once findings have been reviewed and confirmed, and shall be incorporated within the EQA report.

10.3 Each action plan shall clearly specify:
- The nature of the non-compliance or issue identified
- The corrective action required
- The individual(s) responsible for completing the action
- The deadline by which the action must be completed
- The evidence required to demonstrate that the action has been satisfactorily addressed.

10.4 Centres shall comply with all actions within the timescales specified and shall provide sufficient evidence to Smart Awards to demonstrate completion.

10.5 Smart Awards reserves the right to undertake further monitoring activity to verify the completion and effectiveness of actions.

10.6 **Sanctions:** Smart Awards reserves the right to impose sanctions where a centre fails to comply with requirements, presents a risk to the integrity of assessment or certification, or fails to complete required actions within agreed timescales.

10.7 Sanctions may include, but shall not be limited to:

- The imposition of low-level remedial actions
- Increased EQA monitoring, including additional remote or onsite audits
- Suspension of certification
- Suspension or withdrawal of Direct Claim Status (DCS).
- Withdrawal of approval for specific qualifications
- Withdrawal of centre approval.

10.8 Sanctions shall be applied in a manner that is proportionate to the level of risk and the severity of non-compliance identified.

10.9 Where a centre is subject to sanctions, Smart Awards may implement enhanced monitoring arrangements, including increased frequency or scope of EQA activity, as deemed necessary.

10.10 Failure to complete action plans within agreed timescales may result in escalation to formal sanctions.

10.11 Smart Awards may suspend certification where it determines that there is a risk to the validity, reliability or integrity of assessment decisions.

10.12 Centres shall retain the right to appeal any EQA decision, including the application of sanctions, in accordance with the Smart Awards Appeals Policy.

10.13 Where EQA activity identifies concerns regarding the accuracy or consistency of centre assessment decisions, Smart Awards may undertake additional scrutiny in accordance with its CASS Strategy. Any resulting corrective actions or sanctions shall be managed in accordance with this Strategy and the relevant Smart Awards policies.

11. COSTING AND CHARGES

11.1 Smart Awards shall invoice centres for all EQA activity following completion of the audit.

11.2 Any additional EQA activity required as a result of increased risk, the application of sanctions, or investigation into malpractice or maladministration shall be chargeable to the centre at the prevailing published rates.

11.3 Centres shall be notified of applicable charges in accordance with Smart Awards' published fee schedule.

12. STANDARDISATION

12.1 To ensure consistency in the application of quality assurance requirements, Smart Awards shall undertake regular EQA standardisation activities, review assessment guidance and monitor the consistency of EQA decisions and practices.

12.2 Where standardisation identifies concerns regarding the accuracy or consistency of centre marking, further scrutiny or moderation shall be undertaken in accordance with the Smart Awards CASS Strategy.

13. RECORD KEEPING

13.1 Smart Awards maintains records of:

- EQA reports and sampling
- Risk ratings and action plans
- Malpractice and maladministration
- Appeals and complaints
- Conflicts of interest

13.2 Smart Awards shall retain EQA records securely in accordance with its Record Retention Policy, applicable data protection legislation and relevant regulatory requirements.

14. APPEALS

14.1 Centres shall have the right to challenge decisions made under this policy.

14.2 Appeals shall be submitted in accordance with Smart Awards' appeals procedure and within defined timeframes.

15. ADVERSE EFFECTS AND REGULATORY NOTIFICATION

15.1 Smart Awards shall comply with all regulatory notification requirements.

15.2 Where Smart Awards has cause to believe that any event has occurred, or is likely to occur, which could have an adverse effect on learners, assessment, or certification, it shall promptly notify Ofqual or Qualification Scotland Accreditations in accordance with applicable conditions.

16. MONITORING AND REVIEW

16.1 This policy shall be reviewed annually, or sooner where required due to changes in legislation, industry requirements, or identified risks.

16.2 Smart Awards shall monitor the effectiveness of this Strategy through EQA outcomes, centre risk ratings, audit findings, standardisation activities and ongoing quality assurance reviews. Findings shall inform continuous improvement and future monitoring arrangements.

17. DATA PROTECTION

17.1 All personal data processed under this policy shall be handled in accordance with applicable data protection legislation, including the UK GDPR and Data Protection Act 2018.

18. OFQUAL GENERAL CONDITIONS

- C1: Arrangements with centres
- C2: Arrangements with third parties
- H5: Moderation and standardisation
- A8: Record keeping
- B3: Data and information
- H1–H3: Marking, moderation, results
- I1–I4: Appeals and results

- B1: Governance
- B2: Quality management

19. QUALIFICATIONS SCOTLAND ACCREDITATION PRINCIPLES

- Principle 4: The awarding body must demonstrate an effective approach to the identification and management of risk
- 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