



Report on the monitoring of
**Health and Safety and
Manual Handling**
qualifications in Wales



JULY 2021

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1. Introduction

This report describes our monitoring of regulated health and safety and manual handling qualifications offered by recognised awarding bodies in Wales. It explains our rationale for undertaking the work and how we carried out the monitoring activity; it summarises our findings and the action we took as a result. The monitoring of health and safety and manual handling qualifications is the third activity which forms part of our wider programme of monitoring vocational qualifications, as outlined in our Vocational Qualifications Strategy, published in December 2016¹.

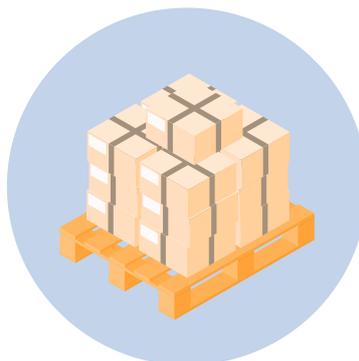
Our monitoring focused on one health and safety qualification and one manual handling qualification offered across eight awarding bodies in Wales. Awarding bodies either offered one or both of these qualifications, which were:

- Level 2 Award in Health and Safety in the Workplace
- Level 2 Award in Principles of Manual Handling

Note: there may be some variation in qualification titles.

We wrote to the awarding bodies in February 2019, requesting evidence for this monitoring activity. With support from health and safety experts, and assessment experts, we reviewed the evidence against our Standard Conditions of Recognition, which set out our requirements relating to the design, assessment and quality assurance of these qualifications.

This report was due to be published in 2020 but was delayed due to work in response to the COVID-19 situation taking priority.



¹ [Qualifications Wales / Vocational Qualifications strategy](#)

Findings

Overall, we were satisfied that the assessments were valid and led to reliable outcomes. We found that the content of the qualifications was fit for purpose and reflected current health and safety practice. Awarding body approaches to both assessment and the level of demand of the assessments were appropriate. Centre management and quality assurance processes were generally found to be robust across awarding bodies.

Three awarding bodies demonstrated that they were compliant with our Standard Conditions of Recognition for these qualifications.

We considered five awarding bodies to be non-compliant with at least one of our Conditions for at least one of the two qualifications. These awarding bodies were required to submit action plans in response to the non-compliances.

Our monitoring also identified some areas that required improvement across awarding bodies, but which we did not consider to be non-compliant with our Standard Conditions of Recognition. In these cases, we issued recommendations for awarding bodies to consider our findings and make changes.

Follow-up activity

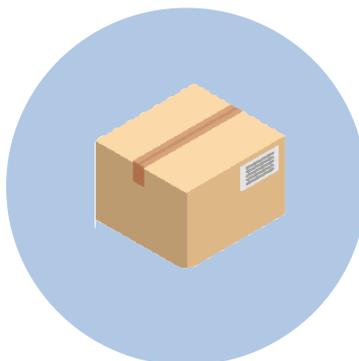
Awarding bodies submitted action plans to us by our deadline of 8 November 2019. We reviewed the action plans to ensure that they were appropriate and fully addressed our concerns.

Following our review and agreement of the action plans, each awarding body completed their respective actions.

Examples of actions completed by awarding bodies were:

- redrafting questions used in live assessments;
- making amendments to command verbs included in the assessment criteria; and
- making amendments to specifications to improve clarity and/or reflect other changes.

We were satisfied with the actions that the awarding bodies took to ensure that they were compliant with our Standard Conditions of Recognition in the identified areas linked to this monitoring activity.



2. Approach to monitoring vocational qualifications

Our monitoring aims to ensure that vocational qualifications are fit for purpose when taken by learners in Wales. Our focused monitoring programme signals to awarding bodies that we have a keen interest in the quality of assessment of vocational qualifications.

We regularly review our monitoring plans to ensure that we are responsive to issues that arise – whilst also taking a strategic approach to the selection of qualifications for monitoring. We take several factors into account when deciding which qualifications to monitor, including whether qualifications:

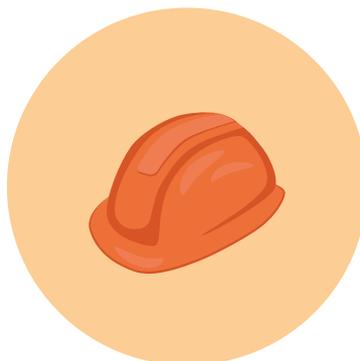
- are eligible for public funding;
- have high numbers of entries and certifications;
- assess areas of work where safety is critical;
- meet a requirement for employment in a related role, or provide a licence to practise;
- provide entry to Higher Education; and
- have had concerns raised about them via our complaints or incidents processes.

Having considered these factors, we decided to focus our monitoring programme on qualifications in the following areas: first aid (2017), food safety (2018) and health and safety, including manual handling (2019).

As part of our monitoring activity, we compare information and evidence from different awarding bodies to test compliance with our Standard Conditions of Recognition with a focus on:

- the validity and reliability of the assessment and the standards set;
- quality assurance processes; and
- the guidance provided to learning providers and the extent to which this is sufficient to meet their needs.

We seek to involve subject experts and assessment experts in conducting some of the monitoring work.



3. Health and safety and manual handling qualifications in Wales

The Health and Safety at Work Act 1974² (HASAWA) describes employers' duties to ensure their employees' health, safety and welfare at work. This includes the provision of information, instruction, training and supervision.

The Health and Safety Executive (HSE) is the independent regulator for work-related health and safety in Great Britain. Its purpose is to prevent work-related death, injury and ill health³.

The HSE website⁴ provides guidance for employers on their legal duties relating to the provision of training and information. Employers must provide "clear instructions and information, as well as adequate training" so that employees know how to work safely and without risks to health.

The Manual Handling Operations Regulations 1992 (MHOR)⁵ set out how employers must deal with risks from manual handling. The HSE provides specific guidance for employers to help them to comply with MHOR⁶. Relevant training is one aspect of reducing the risk of injury.

For most employees, it is not mandatory to hold a qualification in health and safety or manual handling. However, to meet their duties under HASAWA or MHOR, employers may need to provide internal or external training in health and safety and/or manual handling for their employees. This training may or may not lead to a qualification. Qualifications may be regulated or non-regulated.

Qualifications Wales has no regulatory remit to consider either the quality of health and safety or manual handling training or the quality of non-regulated health and safety qualifications.

² <http://www.legislation.gov.uk/ukpga/1974/37/contents>

³ [HSE Annual Report and Accounts 2019/20](#)

⁴ <https://www.hse.gov.uk/simple-health-safety/training/index.htm>

⁵ <http://www.legislation.gov.uk/uksi/1992/2793/contents/made>

⁶ <https://www.hse.gov.uk/msd/manual-handling/index.htm>



4. The health and safety and manual handling qualifications we regulate

Qualifications Wales regulates qualifications, other than degrees, in Wales. Established in 2015 through the Qualifications Wales Act, we regulate qualifications that are developed and delivered by the awarding bodies that we recognise. When an awarding body is recognised by us, it must comply with the rules that we set, including our Standard Conditions of Recognition. These set out requirements relating to design, assessment and quality assurance of qualifications. These Conditions also require awarding bodies to have robust monitoring processes to check the quality of their training providers.

We take the responsibility placed upon us as a regulator of awarding bodies offering health and safety and manual handling qualifications seriously. If an employer is choosing a qualification regulated by us for their employees, we want to make sure that the confidence they have in the quality of that qualification is well-placed. Consequently, an employer who selects a regulated qualification offered by one of our recognised awarding bodies can therefore reasonably expect the quality of the qualification and assessment to be of a good standard.

Courses leading to the achievement of health and safety and manual handling qualifications are generally delivered over a short period of time. For example, the Level 2 Award in Health and Safety in the Workplace would typically be delivered over six to ten hours, whilst the Level 2 Award in Principles of Manual Handling is typically delivered over four to seven hours. This includes all learning and the completion of the required assessment. To successfully complete these qualifications, learners must demonstrate understanding against specified assessment criteria that assess underpinning knowledge and understanding of health and safety and manual handling. The qualifications do not assess professional competence or practical skills.



A range of health and safety and manual handling qualifications was awarded for the period 1 October 2017 to 30 September 2018, across levels 2 to 6, totalling 3,515 certificates. This was the next highest volume of certifications after qualifications in first aid and food safety. These qualifications covered areas such as health and safety in the workplace and occupational health and safety practice.

The Level 2 Award in Health and Safety in the Workplace had a high certification volume (2,090) in Wales for the period 1 October 2017 to 30 September 2018. This is a general health and safety qualification, aimed at providing learners with knowledge and understanding of health and safety in the workplace. We therefore decided to monitor this qualification as it is potentially suitable for all sectors.

We included in our monitoring all level 2 qualifications with ‘manual handling’ in the title. Collectively these qualifications represented the next highest volume of certifications (1,180) in the sector for the same period.

Table 1 below shows the number of certificates issued by awarding bodies for the selected health and safety and manual handling qualifications in Wales between 1 October 2017 to 30 September 2018.

Table 1: Certifications on health and safety and manual handling qualifications in Wales 1 October 2017 to 30 September 2018⁷

Qualification	Number of certifications
Level 2 Award in Health and Safety in the Workplace	2,090
Level 2 Award in Principles of Manual Handling*	1,180
Total	3,270

**including all level 2 awards with manual handling in the title*

By selecting these qualifications, we monitored qualifications which represented 93% of the total certifications in Wales at levels 2 to 6 with ‘health and safety’ or ‘manual handling’ in the title. The selected qualifications all assess knowledge and understanding of health and safety legislation.

⁷ This includes some data in relation to qualifications which were no longer available to centres in Wales by the time we carried out our monitoring activity.

Table 2 shows the eight awarding bodies included in the monitoring of health and safety and manual handling qualifications and the number of overall certifications by each awarding body between 1 October 2017 to 30 September 2018.

Table 2: Certifications by awarding body in Wales between 1 October 2017 to 30 September 2018.

Awarding body	Level 2 Award in Health and Safety in the Workplace	Level 2 Award in Principles of Manual Handling
British Safety Council (BSC)	340	45
City & Guilds	65	25 ⁸
Highfield Qualifications	1,005	*
Pearson	0 ⁹	*
Qualsafe Awards	175	520
Qualifications Network (QNUK)	20	70
Royal Society for Public Health (RSPH)	215	*
Training Qualifications UK Ltd (TQUK)	5	*
Total	1,825	660

Asterisk denotes that the awarding body does not offer this qualification.

⁸ City & Guilds requested to withdraw their Level 2 Award in Safe Manual Handling of Objects from regulation in Wales prior to the start of this monitoring activity. This was due to the qualification no longer being available in Wales at this time.

⁹ Although Pearson did not have any certifications during this period, the awarding body indicated that it would continue to offer the qualification in the future.



5. How we monitored the qualifications

We wrote to the eight awarding bodies offering the selected health and safety and manual handling qualifications in Wales in February 2019, setting out our monitoring approach and requesting evidence for us to review.

The monitoring activity focused on the extent to which assessment was valid and produced reliable outcomes. We also focused on the awarding bodies' processes for approving centres to deliver these qualifications and for monitoring centres on an ongoing basis. We monitored the awarding bodies against our Standard Conditions of Recognition, which set out requirements relating to the design and delivery of qualifications, assessment and quality assurance.

We reviewed the information submitted by awarding bodies during 2019. We undertook a desk-based review of qualification specifications, guidance materials, centre management processes, and internal and external quality assurance procedures. We also contracted a panel of two external health and safety experts and one external assessment expert to conduct a technical review of assessment materials, samples of learner-assessed evidence and accompanying internal and external quality assurance documentation.

As part of the monitoring of these qualifications, we engaged with our fellow qualification regulators, Ofqual in England and CCEA Regulation in Northern Ireland. We engaged with these regulators to ensure that they were aware of the work we were undertaking on qualifications that they also regulate and updated them on our findings and our proposed action.



6. What we found

Our overall findings were positive and showed that the qualifications we reviewed met their stated purpose. In respect of the health and safety qualifications that were looked at for the purpose of this monitoring activity, three awarding bodies (Highfield, Qualsafe and RSPH) were found to be compliant with the Standard Conditions of Recognition. For the remaining five awarding bodies, we identified some issues relating to delivery and assessment, which are outlined below.

Areas of non-compliance

Our monitoring identified some shortcomings across five awarding bodies, which we considered to be non-compliant with at least one of our Conditions for at least one of the two qualifications. We identified similar themes across awarding bodies.

Qualification and assessment design

Command verbs

One aspect we considered during the review of evidence was to consider whether the published assessment criteria are aligned with what the learner needs to do to successfully complete the assessment. This is one aspect that we check as part of reviewing the validity of the qualification.

Command verbs are used in the assessment criteria for a qualification to tell teachers and learners how the learner is expected to demonstrate their knowledge and understanding when being assessed. We found that in two cases there was a lack of alignment between the command verbs in the specification and what they were subsequently asked to do in the assessment. For instance, we saw examples of assessment criteria which required that a learner should ‘explain’, ‘outline’ or ‘describe’ to successfully achieve the criteria. However, the approach taken to the assessment (multiple-choice examination) did not always allow the learner the opportunity to demonstrate these skills. Despite this, we did consider that what the learners were required to demonstrate during the assessment was valid in meeting the purpose of the qualification. Therefore, in this instance, this did not significantly undermine the validity of the qualification. However, awarding bodies should ensure that there is alignment between assessment criteria and the assessment. Our monitoring identified some examples where awarding bodies had already identified and remedied this issue during their qualification review process.



Sufficiency of information for centres

Indicative content within the qualification specification

We found that some awarding bodies offering these qualifications were non-compliant with Condition D8.1, which states that an awarding body must provide sufficient information for teachers to enable them to effectively deliver the qualifications.

We also found that three awarding bodies offering these qualifications were non-compliant with Condition E3.2(f). This Condition states that an awarding body must ensure that the specification for a qualification sets out the knowledge, skills and understanding that will be assessed as part of the qualification (giving a clear indication of their coverage and depth). In this instance, the specifications did not include sufficient information for centres on the knowledge required to be covered to prepare learners for the assessment.

Where indicative content had been included in specifications, it was usually considered to be at the right level of detail to provide centres with sufficient information to prepare learners for all aspects of the assessment. We also saw good examples where awarding bodies provided additional resources to support those delivering the qualifications.

In addition to the above, there were a number of awarding body specific issues of non-compliance, examples of these are discussed below.

Publication of a qualification specification

One awarding body offering the health and safety qualification was found to be non-compliant with Condition E3.3(a), which states that an awarding body must ensure that the specification for a qualification is clear, accurate and communicates, to the reasonably informed person, what the qualification requires of the learner in respect of each of the details that is applicable to the qualification. In this instance, the specification did not clearly communicate information regarding the method of assessment.

Setting the assessment

We also found non-compliance by one awarding body with Condition G1.1(a), which states that an awarding body must ensure the content of the assessment is fit for purpose. In this instance, there were inaccuracies in some questions, which undermined the validity of the assessment.

Marking the assessment

One awarding body offering the health and safety qualification was found to be non-compliant with Condition H1.1(a), which states that an awarding body must have in place effective arrangements to ensure that, as far as possible, the criteria against which learners' performance will be differentiated are understood by assessors and accurately applied. In this instance, there were examples of incorrect marking and also inconsistencies in marking across assessments.

7. What action we took

Following our monitoring, we concluded that the issues of non-compliance identified could be addressed through submission of action plans by the awarding bodies. In the autumn of 2019, we outlined our findings to each awarding body and set out what we expected them to do to address the non-compliance that we had identified. We also updated our fellow regulators with our findings and the action that we intended to take.

Action plans

We required four awarding bodies (British Safety Council, City & Guilds, Pearson and TQUK) to submit action plans to us, setting out how they were going to address the non-compliance that we had identified, to ensure that they fully met our Standard Conditions of Recognition. One awarding body (QNUK) informed us that they had already reviewed their qualifications in light of feedback received from a previous monitoring activity, and taken measures to address areas of non-compliance within new versions of the specifications. As a result, we did not require QNUK to submit an action plan, but we required them to inform us when the new specifications would be available. The updated specifications were published in March 2020.

Each awarding body that submitted an action plan to us provided us with evidence outlining the changes they had already made and/or were proposing to make. Three of the awarding bodies demonstrated that they had addressed our findings and had taken appropriate action to resolve any non-compliances. For two awarding bodies (City & Guilds and TQUK), we considered the issues of non-compliance significant enough to recommend that they voluntarily suspended registration of learners on those qualifications until the issues were resolved. Both awarding bodies did suspend registrations while they resolved these issues through their action plans.

We monitored each of the awarding bodies' action plans until all actions were completed to our satisfaction.

Recommendations

We also made recommendations to all of the awarding bodies where we identified areas which could be improved but did not constitute non-compliance with our Standard Conditions of Recognition. We recommended that the awarding bodies consider these areas but we did not require them to take action.



8. Conclusion and next steps

We conclude that overall, these health and safety and manual handling qualifications are valid, reliable and meet the reasonable needs of learners in Wales. Where issues were identified through our monitoring, we took a proportionate, transparent and targeted approach by requesting action plans from four awarding bodies and considering more formal regulatory action where we had continuing concerns.

We are pleased that all awarding bodies responded positively to the findings of our monitoring and worked with us to address the identified areas of non-compliance. All of the identified actions have now been completed by all relevant awarding bodies, resulting in amendments to:

- multiple-choice assessment papers;
- assessment criteria; and
- specifications.

These amendments improve the validity of the assessments and ensure that specifications clearly identify what learners should know and understand in order that they can prepare for assessment.

The shortcomings identified during the monitoring of health and safety and manual handling qualifications may not be confined to that sector. As part of our final feedback to the awarding bodies that were part of this monitoring activity, we recommended that they should review their other vocational qualifications in light of our findings.

We are continuing to undertake routine monitoring activities of vocational qualifications. We may also undertake other monitoring activities of vocational qualifications in response to issues we identify. We will continue to work with our fellow regulators to share any concerns on the delivery, assessment and award of vocational qualifications and discuss how we can work collaboratively to address those concerns.

We encourage all awarding bodies offering regulated qualifications to consider whether the issues we have identified in this report are also a risk to the validity of the qualifications they offer, and if so, to take appropriate action to address those issues.

