



Sanctions Policy

Introduction

This policy sets out the sanctions Qualsafe Awards (QA) may impose on approved Centres who fail to meet our requirements and those set by the regulatory authorities.

QA aims to make sure the application of sanctions is a last resort. With our approach of support, guidance and the creation of appropriate action plans, we work with Centres to prevent situations arising that would warrant a sanction.

Centre's responsibility

QA approved Centres must take all reasonable steps to prevent the occurrence of any malpractice or maladministration in the delivery and assessment of qualifications. Additionally, in the event of any incident of malpractice or maladministration, Centres must take all reasonable steps to mitigate the effect of any actual or potential adverse effects.

Note: *QA Malpractice and Maladministration Policy* has more details.

It is important Centre staff involved in the delivery of our qualifications are fully aware of the contents of this policy and the possible implications on your Centre if you fail to comply with the requirements specified for the delivery of our qualifications.

Approach to sanctions

QA has a range of sanctions it can impose on a Centre. These depend on the:

- Seriousness of the situation
- Risk to:
 - the interests of Learners
 - the security and integrity of regulated qualifications
 - our reputation
- the Centre's record of maintaining compliance

However, if sanctions are required, we will apply them depending on the situation. For example, sanctions may be applied if the Centre has:

- Outstanding actions (eg from an External Quality Assurance (EQA) visit report)
- Poor records confirming assessment decisions
- Lack of Internal Quality Assurance (IQA) activity
- Persistently marked assessments incorrectly
- Increased the likelihood of an adverse effect occurring (eg something likely to have an adverse effect on the standard of the regulated qualifications they are delivering or public confidence in regulated qualifications)
- Refused access to premises or records to QA staff or regulatory authorities
- Been unresponsive or unjustifiably late in responding to QA's attempts to contact
- Failed to abide by QA's Centre Terms and Conditions and Centre Agreement
- Been suspected or found guilty of malpractice or maladministration

If a Centre refuses to pay outstanding fees or invoices despite reminders to pay from our Accounts team, we may cancel the Centre with immediate effect. We consider this to be a commercial decision based on good business practice.

QA may also sanction Learners if they are found guilty of malpractice or maladministration (e.g. plagiarism, cheating or collusion) in relation to qualification assessments. The sanction applied will be dependent on the severity of the malpractice or maladministration identified, however QA reserves the right to request that a Learner complete a training course again or resit assessments, suspend certification or impose an indefinite ban on Learners undertaking QA qualifications if they are found guilty of such activities. In cases where a Learner has been issued with a certificate for a qualification and they have subsequently been found guilty of plagiarism, cheating or collusion in relation to the qualification assessment(s), QA will revoke the certificate issued.

Sanction levels

If there is clear evidence of non-compliance by a Centre, sanctions may be imposed by the QA Operations and Compliance Manager, the QA Head of Quality Assurance or an External Quality Assurer (EQA).

The QA Head of Quality Assurance is responsible for overseeing the work of the EQAs and for ensuring:

- They are fully aware of all applicable requirements and regulations
- The accuracy and consistency of their work
- There is sufficient rationale/evidence for any sanction to be imposed
- Any sanction they impose is appropriate and proportionate

Level	Sanction
1	<p>Pre-course registration in relation to:</p> <ul style="list-style-type: none"> • an entire qualification suite • all qualifications • a specific Trainer/Assessor <p>or</p> <p>Revoke direct claim status in relation to:</p> <ul style="list-style-type: none"> • an entire qualification suite • all qualifications • a specific Trainer/Assessor
2	Increased levels of moderation and/or external quality assurance activity (when concern exists around any aspect of course delivery or assessment administration by a Centre)
3	Centre suspension (in relation to all qualifications) Note: Centres will not be able to access the Customer Portal system
4	<p>Withdrawal of approval for a:</p> <ul style="list-style-type: none"> • qualification • qualification suite • a specific Trainer/Assessor/IQA <p>(which could be applied, for example, when specific concerns arise either over qualification delivery or an individual's ability to train/assess a qualification)</p>
5	<p>Withdrawal of Centre approval</p> <p>Only used in exceptional circumstances of extremely serious non-compliance, such as identified malpractice, the persistent failure of the Centre to address outstanding actions and/or the failure to address previous sanctions or cooperate with QA</p>

QA are unlikely to impose the immediate withdrawal of Centre approval without:

- Giving the Centre an opportunity to address the areas of non-compliance
- First imposing one of the lesser sanctions
- Evidence that the non-compliance poses a significant threat to the interest of Learners or the integrity of regulated qualifications

If a Centre's approval status is withdrawn, we will take all reasonable steps to protect the interests of Learners currently registered on QA qualifications. For example, we will attempt to transfer Learners to another Centre to enable them to complete their qualification.

In all instances, QA will communicate the nature of the sanction and the rationale for application in writing to the Centre.

Appeals

If a Centre is unhappy with a sanction that has been imposed by QA, they can appeal the decision in accordance with the *QA Appeals Policy*.

External quality assurance

QA has a responsibility to Learners undertaking our qualifications and the regulatory authorities to make sure Centres deliver qualifications and conduct assessments in accordance with the relevant requirements.

Our quality assurance processes include checking documents from Centres, reviewing Learner evidence and dealing with enquiries, complaints or appeals, as well as carrying out EQA visits.

In order to meet this responsibility, our team of experienced EQAs monitor and verify the performance of each QA Centre.

We allocate EQAs to Centres depending on their area of expertise and geographical location and to make sure EQAs are not allocated to visit a Centre where they have or had a personal interest.

In addition to helping Centres successfully deliver our qualifications and providing them with effective advice, guidance and information, the EQAs are responsible for making sure each Centre has appropriate quality assurance procedures and resources in place.

For example:

- Making sure assessment arrangements are fit for purpose and assessment decisions are regularly sampled, through internal quality assurance activity
- Making sure the Centre is taking all reasonable steps to prevent malpractice or maladministration
- Confirming previously assigned action plans have been completed
- Making sure the Centre retains appropriate, accurate and up to date records

After an EQA visit, the EQA produces a report that is issued to the Centre.

The Centre can review the report and is encouraged to provide feedback on the:

- Findings and outcomes

Note: If a Centre disagrees with any findings and the matter cannot be resolved with the EQA, they can raise the matter with QA through the arrangements outlined in our *Appeals Policy*)

- Conduct of the EQA
- Services and/or support offered by QA

Qualsafe Awards

Policy review arrangements

QA will review this policy annually as part of our continuous improvement activities and revise it as and when necessary in response to customer and Learner feedback, changes in our practices or the outcome of investigations.

In addition, we may update this policy in light of operational feedback to make sure our arrangements for imposing and removing sanctions remain effective.

Contact us

If you have any queries about the contents of the policy, contact our customer service team:

Tel: 0845 644 3305

Email: info@qualsafeawards.org



Anita Goodfellow
Chief Executive Officer
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