



Sanctions Policy

Introduction

QA responsibilities

As an awarding organisation recognised by the UK qualification regulators (Ofqual, Qualification Wales, Council for the Curriculum, Examinations and Assessment), Qualsafe Awards (QA) has a responsibility to ensure that the regulated qualifications it designs, develops and awards are delivered and assessed to a high standard in line with all our and any applicable regulatory requirements. Fulfilling this responsibility contributes towards maintaining recognition as an awarding organisation and a high level of public confidence in the qualifications available on the respective UK regulated qualification frameworks.

Monitoring activities

QA carries out a range of standard external quality assurance (EQA) and other monitoring activities to ensure that approved Centres, Trainers, Assessors and Internal Quality Assurers (IQAs) are meeting all QA and regulatory requirements with respect to course administration, qualification delivery and Learner assessment. These activities include:

- EQA visits to Centres
- Moderation activity on course and learner assessment paperwork
- Invoice payment monitoring
- Financial and due diligence checks
- Identifying issues arising through the course of normal business

Through the course of these monitoring activities, it may be identified that a Centre, Trainer, Assessor or IQA is not meeting certain QA or regulatory requirements. If so, QA will assign actions and agreed target dates for completion with a view to ensuring the Centre maintains compliance. QA assigns these to give the Centre an initial opportunity to resolve the situation with respect to compliance without any further action being taken. QA has an enabling approach to compliance and provides support and guidance to centres on how to resolve compliance issues at this stage.

In cases where compliance issues have been identified which suggest either malpractice or maladministration has taken place at a Centre, QA may launch an investigation to establish the impact and severity of the scenario.

QA may also impose sanctions on those who fail to meet our requirements and/or those of our regulators. This policy provides Centres, Trainers, Assessors, IQAs and Learners with information on:

- the external quality assurance and other activities carried out by QA through which sanctions could be imposed
- the range and levels of sanctions available that may be imposed
- the impact that these sanctions will have on status or approval
- what to do when sanctions have been imposed to ensure (where possible) their removal

The type and level of sanctions that QA may impose on any Centre will be dependent on numerous factors, including the:

- Risk to or level of impact upon:
 - the interests of Learners
 - the security and integrity of regulated qualifications
 - compliance with QA requirements

- QA's reputation
- QA's ability to maintain regulatory compliance
- Centre's previous record of maintaining compliance
- Centre's willingness to cooperate with QA to resolve compliance issues

Centres

Centre's responsibilities

QA approved Centres have a responsibility to ensure that all staff, Trainers, Assessors and IQAs involved in the administration, delivery, assessment and quality assurance of our qualifications are fully aware of

- all QA requirements
- the contents of this policy
- the possible implications for their Centre if QA requirements are not met.

If a Centre has been assigned actions by QA through the course of any standard monitoring activity, then the Centre has a responsibility to ensure that the necessary work is carried out to close off the action and maintain compliance.

The Responsible Person for the Centre must ensure the necessary action is taken by the agreed date and they must make the appropriate staff members, Trainers, Assessors and/or IQAs aware of what action they are responsible for carrying out.

If any assigned action is not carried out as required, QA may impose sanctions on the Centre and these will remain in place until the situation with respect to compliance (where possible) is resolved.

QA approved Centres are responsible for taking all reasonable steps to prevent malpractice or maladministration occurring when delivering QA qualifications and training and assessing Learners. In the event of any malpractice or maladministration being identified, Centres must take all reasonable steps to mitigate the effect of any actual or potential *Adverse Effects*. Please refer to the *QA Malpractice and Maladministration Policy* for more detail in this respect.

Centre Sanctions

QA will impose sanctions appropriately and proportionately on a case by case basis dependent on the severity of the situation. To provide some examples, sanctions may be imposed as an outcome of standard monitoring activity when:

- The Centre has not completed actions assigned through an EQA Visit within the agreed timescale (the sanctions assigned will be dependent on the nature of the incomplete actions)
- QA Moderation activity has identified repeated error with assessment marking at a Centre (this may lead to revocation of Direct Claims Status (DCS) for the Centre)
- There is insufficient IQA activity at the centre (this may lead to an enforcement of IQA activity by QA)
- The Centre has refused QA or the qualification regulators access to premises or records (this may lead to Centre suspension or cancellation if access is continually denied)
- The Centre has been unresponsive or repeatedly late in responding to communication from QA through the

normal course of business (this may also lead to suspension until communication is made or cancellation)

- The Centre has been investigated or found guilty of malpractice or maladministration (a Centre will be suspended during any such investigation and if malpractice or repeated maladministration is confirmed, then the Centre will be cancelled)
- Repeated requests to pay outstanding invoices have not been actioned by the Centre (this will initially lead to the suspension of the ability to make purchases through QA and ultimately, should payment not be received, to Centre cancellation)

Centre Sanction Levels

Appendix 1 (Centre Sanctions) details the full range of sanctions and associated levels that QA may impose on Centres.

Removing Sanctions

When QA imposes sanctions on a Centre, the Responsible Person will be informed of the sanctions imposed and the actions that must be carried out in order for compliance to be restored and the sanctions removed.

Should a Centre be unable or unwilling to carry out the necessary actions to facilitate the removal of sanction levels 1 to 4 then the level 5 sanction of cancellation may be imposed.

Centre sanctions will only be removed once the relevant actions have been taken and QA are satisfied that the identified compliance issues have been fully resolved.

Trainers/Assessors/IQAs

Trainers/Assessors/IQA's responsibilities

When a Trainer, Assessor or IQA becomes approved with QA, they are required to deliver training, assess Learners and/or carry out internal quality assurance in line with the requirements outlined in the following QA documents:

- *Trainer, Assessor and IQA Code of Conduct*
- *Centre Quality Assurance Guidance*
- *Centre Handbook*
- *Qualification Specifications and Assessment Guidance*
- *Quality Assurance Portal Guidance*
- *Trainer Risk Rating Guidance*

Trainers, Assessors and IQAs have a responsibility to ensure that they are fully aware of and understand the content of these documents. They are also required to be aware of the contents of this policy document and the possible implications for them as approved Trainers, Assessors and IQAs if they do not meet QA requirements relating to qualification delivery, Learner assessment and internal quality assurance.

Trainers and Assessors also have responsibility for ensuring that Learners are aware of all relevant information prior to any course commencing (e.g. the QA Training Commitment document).

QA monitors Trainer, Assessor and IQA performance through our standard external quality assurance

activities. When compliance issues are identified through these activities then the Centre and/or the Trainer, Assessor or IQA in question may be assigned actions with a view to resolving the issues.

In cases when these actions have not been carried out by the agreed timescales and compliance remains an issue, QA may impose sanctions on the Centre and/or individual Trainers, Assessors or IQAs. QA also reserves the right to impose sanctions on Trainers, Assessors or IQAs when initiating or after concluding a compliance investigation.

Trainer/Assessor/IQA Sanctions

To provide some examples, sanctions may be imposed on Trainers, Assessors or IQAs as an outcome of standard monitoring activity when

- Insufficient IQA activity has been identified through an EQA visit (QA may enforce that IQA activity be carried out on courses delivered by a specific Trainer)
- Trainer/Assessor/IQA qualifications or continuing professional development (CPD) portfolios are no longer current and up-to-date in line with approval requirements (QA will lapse the approved status of the Trainer/Assessor/IQA until currency is achieved)
- Concerns have been raised over course delivery or Learner assessment (QA may revoke the Direct Claims status of a specific Trainer or Assessor due to concerns over course delivery or Learner assessment)
- Trainers/Assessors have not maintained the integrity and security of the assessment process by failing to control or deliberately allowing unauthorised access to Assessment Guidance documents (QA may suspend a specific Trainer, Assessor or IQA pending investigation)

Trainer/Assessor/IQA Sanction Levels

Appendix 2 (Trainer/Assessor/IQA Sanctions) details the full range of sanctions and associated levels that QA may impose on Trainers/Assessors/IQAs if deemed necessary.

Removing Sanctions

When QA imposes sanctions on a Trainer, Assessor or IQA, the Responsible Person for the Centre and the individual in question will be informed of the actions which must be carried out in order for compliance to be restored and sanctions removed.

Should a Trainer, Assessor or IQA be unable or unwilling to carry out the necessary actions to facilitate the removal of sanction Levels 1 to 4, then the Level 5 sanction of cancellation may be imposed. Dependent on circumstances, this may also lead to sanctions being imposed on the Centre (e.g. if QA have evidence to suggest Trainers/Assessors/IQAs have not been managed appropriately by the Centre).

Trainer/Assessor/IQA sanctions will only be removed once the relevant actions have been taken and QA are satisfied that the identified compliance issues have been fully resolved.

Learners

Learner responsibilities

QA expects that a Learner undertaking any QA qualification will

- Provide all necessary evidence to confirm they meet the entry requirements (where applicable)
- Declare any illnesses or conditions that they may have prior to course commencement (for the purposes of Reasonable Adjustments being made)
- Behave in a professional and courteous manner at all times towards Centre staff and other Learners
- Prepare for and take part in any training activities and Learner assessments as instructed by their Trainer/ Assessor delivering their course
- Complete all registration and assessment paperwork in a clear and legible fashion
- Maintain the integrity and security of the Learner assessment process
- Declare any illnesses or conditions that they may have on the day of training or assessment (for the purposes of Special Consideration being given)
- Cooperate fully with the Centre and/or QA through the course of any compliance investigation (if required)

QA monitors Learner assessments through our standard external quality assurance activities (e.g. course moderation). Through the course of these activities, evidence may be obtained that Learner plagiarism, cheating or collusion may have occurred.

When such issues are identified, QA will launch an investigation. The Responsible Person for the Centre and the Trainers/Assessors/IQAs involved in Learner assessment and quality assurance will be informed and asked to provide further information and evidence to support the investigation activities.

The Learner (or Learners) will also be informed of the investigation and asked to provide information in support of their case against the suspected plagiarism, cheating or collusion.

At this stage, QA may suspend the Learner (or Learners) while the investigation is carried out. Dependent on the circumstances, QA may also suspend the Centre or any Trainer/Assessor/IQA if this is deemed necessary.

At the end of the investigation, if the available evidence confirms that Learner plagiarism, cheating or collusion has occurred, then QA may impose sanctions on the Learner. Again, dependent on the circumstances, QA may also impose sanctions on the Centre or any Trainers/Assessors/IQAs involved.

Learner Sanctions

To provide examples, sanctions may be imposed on Learners, as an outcome of standard monitoring activity when

- A cohort of Learners have submitted workbook assessments which contain text that is highly similar to the others (QA may initially suspend a Learner or Learners pending investigation of possible plagiarism or collusion)
- A Learner has submitted a workbook assessment that contains text which is exactly the same as that contained in the QA Assessment Guidance intended for Trainer/Assessor/IQA use only (QA may initially suspend the Learner and/or any Trainer/Assessor/IQA involved pending investigation)
- QA has obtained information suggesting that a Learner undertaking an Multiple Choice Question (MCQ) paper assessment was attempting to copy other Learners answers (QA may initially withhold certification and/or suspend Learners pending investigation of possible cheating)

Learner Sanction Levels

Appendix 3 (Learner Sanctions) details the full range of sanctions and associated levels that QA may impose on Learners if deemed necessary.

Removing Sanctions

When QA imposes Level 3 sanctions on any Learner, the sanction will be considered lifted once the identified action has been taken (i.e. an assessment or course has been retaken).

With respect to Learner suspension and after any compliance investigation has been concluded, QA will inform Learners if the suspension has been lifted and whether or not any further sanctions have been applied (e.g. an indefinite ban may be imposed if plagiarism, cheating or collusion has been confirmed).

In cases where a Learner has been issued with a certificate for a qualification and they have subsequently found guilty of plagiarism, cheating or collusion in relation to the qualification assessment(s), QA will revoke the certificate issued.

Policy Review

QA will review this policy on an ongoing basis as part of our continuous improvement activities and revise it as and when necessary in response to customer 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
19 November 2018

Appendix 1 Centre Sanctions

Level	Sanction
	The following sanctions may be assigned by QA
1	Enforcement of Pre-Course Registration in relation to the Centre and: 1.1 a specific qualification(s) 1.2 a suite of qualifications 1.3 more than one suite of qualifications 1.4 all qualifications/suites of qualifications
2	Revocation of Direct Claims Status in relation to the Centre and: 2.1 a suite of qualifications 2.2 more than one suite of qualifications 2.3 all qualifications/suites of qualifications Revocation of Credit Facility in relation to: 2.4 the Centre
3	Enforcement of Internal Quality Assurance Activity in relation to the Centre and: 3.1 a specific qualification(s) 3.2 a suite of qualifications 3.3 more than one suite of qualifications 3.4 all qualification/suites of qualifications
4	Suspension of approved status in relation to: 4.1 the Centre Suspension of approved status in relation to: 4.2 a specific qualification(s) 4.3 a suite of qualifications 4.4 more than one suite of qualifications 4.5 all qualifications/suites of qualifications Suspension of the ability to make purchases through QA in relation to: 4.6 the Centre Revocation of QA Customer Portal access in relation to: 4.7 the Centre Withholding of Learner Certificates in relation to: 4.8 an investigation into possible malpractice/maladministration by the Centre Revocation of Learner Certificates in relation to: 4.9 confirmed malpractice/maladministration during course delivery or Learner assessment by the Centre
5	Cancellation of approved status in relation to: 5.1 the Centre Cancellation of approved status in relation to the Centre and: 5.2 a specific qualification(s) 5.3 a suite of qualifications 5.4 more than one suite of qualifications 5.5 all qualifications/suites of qualifications

Appendix 2 Trainer/Assessor/IQA Sanctions

Level	Sanction
	The following sanctions may be assigned by QA
1	Enforcement of Pre-Course Registration in relation to the Trainer/Assessor: 1.1 a specific Centre and a specific qualification(s) 1.2 a specific Centre and a specific suite(s) 1.3 and a specific qualification(s) across all Centres 1.4 a specific suite(s) across all Centres 1.5 and all qualifications/suites across all Centres
2	n/a
3	Enforcement of Internal Quality Assurance Activity in relation to the Trainer/Assessor and: 3.1 a specific Centre and a specific qualification(s) 3.2 a specific Centre and a specific suite(s) 3.3 a specific qualification(s) across all Centres 3.4 a specific suite(s) across all Centres 3.5 all qualifications/suites across all Centres
4	Suspension of approved status in relation to: 4.1 the Trainer/Assessor/IQA Revocation of QA Customer Portal access in relation to: 4.2 the Trainer/Assessor/IQA
5	Cancellation of approved status in relation to: 5.1 the Trainer/Assessor/IQA

Appendix 3 Learner Sanctions

Level	Sanction
	The following sanctions may be assigned by QA
1	n/a
2	n/a
3	Requirement for the Learner to: 3.1 retake a specific assessment(s) 3.2 retake a specific course(s)
4	Imposition of a Learner Suspension in relation to: 4.1 the investigation of possible plagiarism, cheating or collusion Withholding of Learner Certificates in relation to: 4.2 the investigation of possible plagiarism, cheating or collusion Imposition of a ban on the Learner: 4.3 for a specified period of time Revocation of Learner certificate in relation to: 4.4 confirmed plagiarism or collusion
5	Imposition of a ban on the Learner: 5.1 for an indefinite period