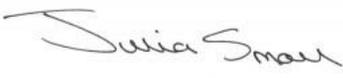




# Sanctions Policy

<b>Version</b>	9
<b>Date</b>	August 2023
<b>Reason for review</b>	Annual Review
<b>Changes</b>	Page 2- The Centre EV will also undertake unannounced and announced visits to observe delivery and assessments and conduct moderations for practical skills-based assessments Page 9- Mandatory Disclosure and Confidentiality
<b>Reviewed by</b>	M Lovell – Responsible Person D Clueit - External Verifier
<b>Ratified by</b>	
<b>Date of next annual review</b>	August 2024

## Introduction

This policy is aimed at recognised Centres delivering RoSPA Qualifications who have failed to meet aspects of our delivery requirements or quality assurance arrangements or are in breach of Ofqual's General Conditions of Recognition. This policy sets out the sanctions we may impose on Centres in such situations, and any other situations where we have cause to believe that malpractice or maladministration may have occurred. It is also used by our staff, to ensure they apply any sanctions in a consistent manner.

## Centre's responsibility

It is important that Centre staff, who are involved in the delivery of our qualifications, are fully aware of the contents of the policy and the possible implications for the Centre, should you fail to comply with the delivery requirements specified by RoSPA Qualifications.

## Ensuring the standards of our qualifications

RoSPA Qualifications has a responsibility to learners taking our qualifications, and the qualifications regulator, (Ofqual) to ensure that Centres deliver our qualifications in accordance with relevant standards.

To fulfil this responsibility, a range of external quality assurance and monitoring activities such as Centre visits (announced and unannounced) and moderations are carried out to ensure that Centres, Trainer/Assessors and Internal Verifiers are all meeting RoSPA Qualifications and regulatory requirements for:

- course administration
- qualification delivery
- assessments

The performance of each RoSPA Qualifications Centre is monitored and verified by our team of experienced External Verifiers (EVs). These individuals hold appropriate external verification qualifications and occupational competency where required.

An EV will assure the quality of delivery by monitoring the performance of a Centre, through moderations, and centre visits.

During a Centre performance visit the EV will:

- Address any queries the Centre may have
- Update the Centre on relevant RoSPA Qualifications developments
- Review the Centre's management, delivery, and quality assurance arrangements, in accordance with the Centre Agreement and Centre Handbook
- Where possible observe assessments taking place
- Review assessment paperwork.

The Centre EV will also undertake unannounced and announced visits to observe delivery and assessments and conduct moderations for practical skills-based assessments.

Some visits may take place remotely, through electronic media and or requesting assessment materials.

After the visit, the EV will produce a report that will be available to the Centre on the Qualification Management System (QMS).

The report will:

- Provide details of any assessment decisions that have been overturned because the EV feels that an assessment decision made by an assessor, or internal verifier, is inaccurate or inconsistent
- Provide an action plan with recommendations for the Centre to implement actions by agreed deadlines.
- Provide details of, and the rationale for, any sanctions that RoSPA Qualifications will impose (see the next section for details)

The Centre will have the opportunity to review the factual accuracy of the report and will be required to provide feedback on:

- The conduct of the EV.
- The findings and outcomes of the visit.

If the Centre disagrees with any of the findings, and the matter cannot be resolved directly with the EV, then they may raise the matter with RoSPA Qualifications. This can be done by completing the Centre Feedback section of the Centre Visit Report, or through the arrangements outlined in our Appeals Policy, which is available from the QMS or at <https://www.rospa.com/Qualifications/Policies.aspx>

## Approach to sanctions

RoSPA Qualifications may impose one, or more, of a range of sanctions on a Centre, depending on the level and history of non-compliance, and the degree of risk to the interests of learners and the integrity of the qualifications.

It should be noted that, the application of sanctions is a last resort.

In the first instance we will always work with Centres, through support and management, and the implementation of action plans and recommendations, to prevent the need to impose such sanctions.

The sanctions available to RoSPA Qualifications are:

Level	Sanction
1	Suspension of registration(s) and/or certification(s)
2	Withdrawal of approval for specific qualifications Withdrawal of Trainer/Assessor or IV pending investigation
3	Withdrawal of Centre recognition

Level	Sanction	Reason Imposed	Examples of when it might be imposed
1	Suspension of registration and or certification	<ul style="list-style-type: none"> <li>• High risk to learners</li> <li>• Low integrity of assessment decisions</li> <li>• Risk of invalid certification claims</li> </ul>	<ul style="list-style-type: none"> <li>• Failure to implement agreed action plans</li> <li>• Assessors have insufficient time, resources or authority to adequately perform their role</li> <li>• Insufficient qualified internal verifiers (IV)</li> <li>• Records of assessments insufficient to allow monitoring</li> <li>• Inconsistent assessment decisions</li> <li>• Equality and diversity requirements not met</li> <li>• Registrations not within agreed timescale</li> <li>• Proven cases of maladministration</li> <li>• Failure to provide access to requested records, information, learners, or staff</li> <li>• Failure to assist the qualifications regulator in carrying out monitoring or investigations</li> <li>• Significant anomalies in records of assessment</li> <li>• Assessments that disadvantage certain learners</li> <li>• Assessment standards not maintained</li> <li>• Unreliable evidence</li> <li>• Certification claims made before completion of assessments</li> <li>• Proven cases of maladministration</li> <li>• Failure to manage conflicts of interest within the Centre</li> </ul>

<p>2.</p>	<p>Withdrawal of approval for specific qualifications.</p> <p>Withdrawal of Trainer/Assessor or IV pending investigation. (Suspend pending investigation)</p>	<ul style="list-style-type: none"> <li>• Irretrievable breakdown in management and quality assurance of specific qualifications.</li> <li>• Outstanding invoices repeatedly unpaid by Centre.</li> </ul>	<ul style="list-style-type: none"> <li>• Significant faults in the management and quality assurance of the qualifications, resulting in an ongoing failure to meet the core requirements for the conduct of assessment.</li> <li>• Maladministration or malpractice has taken place that could lead to an adverse effect</li> <li>• Ongoing Centre refusal to RoSPA Qualifications or qualification regulators denying access to premises or records.</li> <li>• Insufficient IV activity has been identified through moderations and visits</li> <li>• Trainer/Assessor/IV qualifications or CPD are no longer up to date in accordance with approval requirements (suspended until currency is achieved)</li> <li>• Concerns brought to light around course delivery and or learner assessments</li> <li>• Misuse by Centre staff of Centre Assessment Guidance which affects integrity of the qualification and assessment processes</li> </ul>
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3	Withdrawal of Centre recognition	Irretrievable breakdown in management and quality assurance of specific qualifications.	<ul style="list-style-type: none"> <li>• Corrective measures for a Level 2 or Level 3 sanction not implemented</li> <li>• Significant faults in the management and quality assurance of all qualifications</li> <li>• Malpractice or maladministration has taken place at Centre level that has led to, or has the potential to lead to, an adverse effect</li> </ul>
<p>Please note that this is not an exhaustive list. Any situation that could lead to an adverse effect, (i.e. prejudice to learners, inability of RoSPA Qualifications to comply with its conditions of recognition, reduction in qualification standards or loss of public confidence in qualifications) could give rise to a sanction.</p>			

## How sanctions will be imposed

It is the role of the EV to monitor, and quality assure Centre performance, and with the Responsible Officer agree action plans and recommendations to correct any noncompliant or quality issues identified. If an EV feels that the situation at a Centre warrants a sanction, they will immediately inform the Responsible Officer (RO), who will notify the Centre of this possibility.

When a Level 1 or Level 2 sanction is imposed, the RO, or a member of the Management Team, will amend the Centre's records and review the EV report, and any representations from the Centre, within **five working days**. If the RO agrees that the sanction should be in place, the Centre and EV will be informed.

When a Level 3 sanction is imposed, RoSPA Qualifications will amend the Centre's record to ensure no further registrations or certifications can be made, and will review the EV report, and any representations from the Centre, within **five working days**. The decision whether to remove qualification approval or Centre recognition will be made by the RoSPA Qualifications Management Team. The EV and the Centre will be notified by the RO. Should qualification approval or Centre recognition be withdrawn, RoSPA Qualifications will implement its Qualification Withdrawal Policy to protect the interests of learners (this policy can be found on the QMS).

Unless there is evidence that a Centre's noncompliance poses a significant threat to the interests of learners or the integrity of the qualifications, it is unlikely that RoSPA Qualifications will impose the immediate withdrawal of approval.

## Sanctions that may be imposed on Trainer/Assessor or IV

Sanctions could be placed on Trainer/Assessor and IVs as a result of findings through standard monitoring activities by EV and Moderator or by Whistleblowing. Examples may include:

- Insufficient IV activity has been identified through moderations and EV monitoring visits
- Trainer/Assessor or IV's qualifications or CPD (occupational competence) are not current or up to date
- Concerns brought to light around course delivery and or learner assessments (RoSPA Qualifications may suspend a specific Trainer/Assessor or IV pending investigation)
- Misuse by Centre staff of Centre Assessment Guidance which affects integrity of the qualification and assessment processes (RoSPA Qualifications may suspend a specific Trainer/Assessor or IV pending investigation)

## Removal of sanctions that may be imposed on Trainer/Assessor or IV

When a sanction/suspension is placed on a Trainer/Assessor or IV, the Responsible Person (RO) EV and the person in question will be informed of any actions that must be carried out by them as result of the investigation to enable them to be reinstated and sanction removed.

## Sanctions that may be imposed on learners

Should a learner, or group of learners, be found to have committed malpractice, sanctions may be imposed on them in accordance with our Malpractice and Maladministration Policy, which is available from the QMS or at [www.rospa.com/qualifications](http://www.rospa.com/qualifications).

This policy should be communicated to the learner by RoSPA Qualifications or the Centre. Possible sanctions include:

- Issuing a written warning to the effect that repetition of the offence may result in further action.
- Loss of all marks for the related work or unit.
- Disqualification from the qualification.
- A ban on undertaking any further qualifications, either permanently or for a set time period.

## Ensuring consistency in our approach

The length of time a sanction will be imposed for will depend on the conditions that warranted its introduction.

The RO will be responsible for regularly reviewing the application and maintenance of sanctions to ensure they continue to be appropriate and proportionate to the issue and the risk of further issues occurring in the future.

## Appeals

If you disagree with the imposition of a sanction, the first point of call is the RO who can be telephoned on 0121 248 2115 or emailed at [enquiries-rq@ROSPA.com](mailto:enquiries-rq@ROSPA.com).

If you are still unhappy with our decision, you can make an appeal by following the outlined in our Appeals Policy, which is available from the QMS or at [www.rospa.com/qualifications](http://www.rospa.com/qualifications).

If, after you have exhausted our appeals process and are still unsatisfied with the outcome, you can complain or appeal directly to the relevant qualification's regulator, such as Ofqual in England.

## Mandatory Disclosure and Confidentiality

It is imperative that in awarding a certificate the integrity of qualifications is maintained; for example, by ensuring learners who are awarded a certificate have a legitimate right to that certificate. We are aware that centres often work with more than one Awarding Organisation (AO) in delivering qualifications, and that therefore more than one AO may be at risk when things go wrong. Our qualifications regulators Ofqual have outlined some specific conditions that we must meet to protect the integrity of regulated qualifications across the awarding community. This includes the requirement that where certain things are identified (such as malpractice), or certain actions taken (such as when sanctions are applied) the Regulators and other relevant AOs who may be affected e.g. those offering similar types of qualifications via the Centre) must be informed.



## Review arrangements

We will review and update this policy annually and revise it on an ad hoc basis, in response to customer and learner feedback, observations from our monitoring data, changes in our practices, current best practice, guidance from the qualifications regulator or external agencies, or changes in relevant legislation.

If you would like to feed back any views or opinions or have a query about any aspect of this policy, please contact us using the details below.

## Contact us

Telephone RoSPA Qualifications on 0121 248 2115

Email us at [enquiries-rq@ROSPA.com](mailto:enquiries-rq@ROSPA.com)

Or write to us at:

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