



Sanctions Policy

Version	7
Date	August 2020
Reason for review	Annual Review
Changes	Removal of direct claims status (DCS) as a sanction, as we do not give centres DCS. Not managing COIs added as an example, where sanctions maybe applied
Reviewed by	Melissa Lovell, Responsible Officer
Ratified by	
Date of next annual review	August 2021

Introduction

This policy is aimed at centres delivering RoSPA Qualifications recognised qualifications, who have failed to meet aspects of our delivery requirements or quality assurance arrangements, or are in breach of the Qualification Regulator's General Conditions of Recognition (Conditions).

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 for use by our staff, to ensure they apply any sanctions in a consistent manner.

Centre's responsibility

It is important that your staff, who are involved in the delivery of our qualifications, are fully aware of the contents of the policy and the possible implications for your 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, to ensure that centres deliver our qualifications in accordance with relevant national standards.

In order to fulfil this responsibility, 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.

During a performance management 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.
- Observe skills based assessments taking place.

Please note some visits may take place remotely e.g. 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 our online 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.

Sanctions Policy

- Provide an action plan with recommendations for the centre to implement 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 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
3	Withdrawal of centre recognition

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

Sanctions Policy

<p>2.</p>	<p>Withdrawal of approval for specific qualifications</p>	<p>Irretrievable breakdown in management and quality assurance of specific qualifications</p>	<ul style="list-style-type: none"> • 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. • Maladministration or malpractice has taken place that could lead to an adverse effect
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Sanctions Policy

<p>3</p>	<p>Withdrawal of centre recognition</p>	<p>Irretrievable breakdown in management and quality assurance of specific qualifications</p>	<ul style="list-style-type: none"> • Corrective measures for a Level 2 or Level 3 sanction not implemented • Significant faults in the management and quality assurance of all qualifications • Malpractice or maladministration has taken place at centre level that has led to, or has the potential to lead to, an adverse effect.
<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 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 or Level 4 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 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.rospace.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@rospaqualifications.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.

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

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@rospaqualifications.com

Or write to us at:

RoSPA Qualifications
RoSPA House
28 Calthorpe Road
Birmingham
B15 1RP



RoSPA Qualifications

28 Calthorpe Road
Birmingham
B15 1RP

t +44 (0)121 248 2000

e enquiries@rospaqualifications.com

www.rospa.com/qualifications

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