

## GA Sanctions Policy

### 1. Purpose and Scope

This document outlines the sanctions that may be applied in the event that a centre fails to comply with Gatehouse Awards (GA) requirements for delivering qualifications in accordance with the relevant regulations, or in the event that an individual learner fails to follow the relevant regulations when undertaking assessment leading to a GA qualification.

The aim of this policy is to safeguard the integrity of GA qualifications, whilst avoiding any unnecessary or unduly burdensome requirements on approved centres.

Sanctions may be imposed to mitigate or correct adverse effects in relation to issues arising from:

- Complaints
- Internal quality assurance
- External quality assurance
- Conflicts of interest
- Malpractice and maladministration
- Access to assessment
- GA's CASS activities
- Any other non-compliance issue identified

### 2. Approach to Sanctions

Sanctions will be applied according to the seriousness and urgency of the situation, the level of non-compliance, the risk to the interest of learners and the potential threat to the integrity of the qualification. GA will always, where possible, work with centres to prevent their imposition. Early intervention is the preferred approach to avoid the escalation of situations and centres should always contact GA for advice and guidance as soon as problems are identified. GA will take whatever action is necessary to protect learners, standards, and confidence in regulated qualifications.

### 3. Application of Sanctions

- Any allegation, suspicion or report will be dealt with in line with the current GA Malpractice & Maladministration Policy
- GA will give notice of its decision and the date that the sanction is to be applied
- Depending on the severity of the case, GA may make transitional arrangements, particularly where learners may be affected
- In extremely serious cases, GA reserves the right to take immediate action in order to protect learners or standards
- Centres, and where applicable individual learners, have the right to appeal against any sanctions proposed or already imposed in line with the GA Appeals Policy and Procedure

- If necessary, GA may seek the co-operation of appropriate third parties in taking action
- If necessary, GA may inform all other Awarding Organisations who offer similar qualifications about the sanction imposed and provide a brief summary of the reasons why the action has been taken
- If necessary, GA will inform Ofqual or other relevant regulatory or Government bodies and will cooperate with any follow-up investigations required by them.

#### 4. Types of Sanction

The type of action GA will take will depend on the impact and risks associated with the problem. The following will be considered:

- The impact on learners and public confidence in regulated qualifications
- Whether the breach applies to just one qualification or if it affects a range of qualifications
- Whether the centre itself has identified the problem and has taken steps to address it
- Whether there is a history of non-compliance with the centre, or, where applicable, an individual learner
- The level of adverse effect the incident may have on the learner, the integrity of the exam, public confidence in GA qualifications or regulated qualifications as an industry, the reputation of GA with the public and/or relevant regulators
- The level of cooperation shown by the centre, or, where applicable, an individual learner, during the course of the investigation

#### 5. Sanctions Applied to Centres

A table of example issues and the resulting sanctions for non-compliance is given below. Please note this list is not exhaustive.

| Non-compliance issue                                                                                                                                                                                                                                                                                                                                                                        | Sanction                             | Rationale                                                                                            | Sanction lifted when:                                                                                          |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|
| 1. a) The centre's policies, procedures and assessment practices, and/or responsibilities of personnel are not clear or well understood by the centre assessment, quality assurance and compliance staff<br>b) use of staff who do not meet the minimum requirements as stipulated by GA (where applicable)<br><br>2. Changes to key personnel, including Directors, not communicated to GA | <b>Level 1-</b> Entry in action plan | Non-compliance with centre approval criteria but no threat to the integrity of assessment decisions. | GA is satisfied that the centre has taken all the necessary steps to resolve the issues and prevent recurrence |

| Non-compliance issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Sanction                                                                                                                                                                                                                                                                                                                                                                                        | Rationale                                                                                                                         | Sanction lifted when:                                                                                                                                                                                                                                                      |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ol style="list-style-type: none"> <li>Centre fails to keep accurate or complete records to allow a full audit to be carried out by the GA EQA</li> <li>Previously agreed corrective measures relating to Level 1 have not been implemented</li> <li>Centre persistently fails to respond to communications from GA or its representatives in a timely manner</li> <li>Allegation of malpractice in which the centre's complicity may or may not be confirmed</li> <li>Allegation of malpractice resulting from the centre's negligence</li> <li>The centre fails to pay invoices as they fall due</li> </ol>                                                                                                                                                   | <p><b>Level 2</b> – Entry in action plan, and, if appropriate, more frequent moderation of qualification submissions and withholding of certification until issue resolved</p> <p><b>Centre is not allowed to expand (i.e. open Satellites, etc.) while Sanction is in place</b></p>                                                                                                            | <p>a) Close scrutiny of the centre's processes and procedures, plus their understanding of their responsibilities is required</p> | <p>GA is satisfied that the centre has taken all the necessary steps to resolve the issues and prevent recurrence</p>                                                                                                                                                      |
| <ol style="list-style-type: none"> <li>Discrepancies in the records or recordings submitted for marking indicating learners have been advantaged or disadvantaged in some way</li> <li>Centre fails to provide access to requested records, information, learners and staff in a timely manner</li> <li>Allegation of malpractice in which the centre's complicity has been, or is likely to be confirmed</li> <li>Qualification submissions show serious anomalies</li> <li>Previously agreed corrective measures relating to Level 2 non-compliance are not implemented</li> <li>Security of examination papers has been compromised or breached but restricted to centre level</li> <li>Failure to effectively quality assure satellite locations</li> </ol> | <p><b>Level 3</b> – As for Level 2 above, plus suspension of staff and/or suspension of the centre's ability to deliver assessments until GA are satisfied that standards are at approved levels (if visits are required, they might be at additional costs to the centre). Possible notification of issues to other Awarding Organisations and/or Ofqual (or other relevant third parties)</p> | <p>a) There is a threat to learners</p> <p>b) The integrity of the assessment practices is compromised</p>                        | <p>GA is satisfied that the centre has taken all the necessary steps to resolve the issues and prevent recurrence. In addition, any learners affected by the actions of the centre have been contacted and, where necessary, re-assessed at the expense of the centre.</p> |
| <ol style="list-style-type: none"> <li>Significant faults in the management and compliance for a qualification</li> <li>Serious allegations of malpractice have been raised in which the</li> </ol>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <p><b>Level 4</b> – As for Level 3 above, plus withdrawal of approval to centre</p>                                                                                                                                                                                                                                                                                                             | <p>Significant breakdown in management and compliance of</p>                                                                      | <p>As for Level 3, plus additional assurances have been received from</p>                                                                                                                                                                                                  |

| Non-compliance issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Sanction                                                                                                                                                                                              | Rationale                                                                                                                                                                                                                | Sanction lifted when:                                                              |
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| <p>evidence shows that, on the balance of probability, the centre has been complicit, affecting the integrity of the assessment and posing a risk to the reputation of GA, as well as an adverse effect on the learner</p> <p>3. Previously agreed corrective measures relating to Level 3 non-compliance have not been implemented</p> <p>4. Security of examination papers has been compromised or breached on a regional, national or international level</p> <p>5. An individual at the centre attempts to influence the actions of the Examination Observers or External Quality Assurers in order to influence the outcome of the result.</p>                                                                                                                                   | for specific qualification.                                                                                                                                                                           | specific qualifications                                                                                                                                                                                                  | the management of the centre as to how they intend to remain compliant in future.  |
| <p>1. Significant faults in the management and compliance of some or all GA qualifications</p> <p>2. Previously agreed corrective measures relating to Level 4 non-compliance are not implemented</p> <p>3. Security of examination papers has been breached on a national or international level and evidence shows that the centre was complicit in this breach</p> <p>4. Centre refuses to cooperate with an GA investigation, including (but not limited to):</p> <ul style="list-style-type: none"> <li>Refusing access to premises to Examination Observers or External Quality Assurers (whether announced or unannounced)</li> <li>Refusing access to learner or relevant staff files during an investigation</li> <li>Refusing to provide learner contact details</li> </ul> | <b>Level 5 – Permanent withdrawal of centre approval for all GA qualifications including informing other relevant Awarding Organisations, Ofqual and any other affected third parties as required</b> | In the opinion of GA, management and/or compliance at the centre has broken down irretrievably, or the reputation of the centre in a wider context has been damaged irretrievably leading to an unacceptable risk for GA | Not Applicable. If a centre has reached a Level 5 Sanction, this cannot be lifted. |

| Non-compliance issue                                                                                                                                                                                                                                                                                                                      | Sanction | Rationale | Sanction lifted when: |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|-----------|-----------------------|
| <ul style="list-style-type: none"> <li>Deliberately putting obstacles in the way of the investigation or divert the focus of the investigation in an effort to conceal evidence of malpractice</li> </ul> <p>5. The centre attempts to influence the outcome of the result is either endemic and / or supported by senior management.</p> |          |           |                       |

## 6. Sanctions applied to individual learners

If a learner is suspected of any form of malpractice during an assessment, GA will determine if, and what type of, sanction or penalty should be applied, according to the evidence presented, the nature and circumstances of the malpractice, and the type of qualification involved.

Not all the sanctions and penalties are appropriate to every type of qualification or circumstance.

These penalties may be applied individually or in combination.

Examples of learner malpractice may include:

- a breach of the instructions given by delivery staff in relation to the examination or assessment rules and regulations;
- collusion: i.e. working collaboratively with other learners, beyond what is permitted;
- copying from another learner (including the use of technology to aid the copying);
- disruptive behaviour in the examination room or during an assessment session (including the use of offensive language);
- failing to report to the centre or GA that they, the learner, has, or has had, unauthorised access to assessment related information or has been involved in sharing or obtaining unauthorised assessment related information online;
- allowing others to assist in the production of coursework, answers to assignments or other assessment tasks or answers to examination questions, or assisting others in the production of coursework, answers to assignments or other assessment tasks or answers to examination questions;
- the misuse, or the attempted misuse, of examination and assessment materials and resources;
- being in possession of unauthorised confidential information about an examination or assessment;

- making a false declaration of authenticity in relation to the authorship of coursework, answers to assignments or other assessment tasks or answers to examination questions;
- impersonation: i.e. pretending to be someone else or arranging for another person to take one's place in an examination or an assessment;
- plagiarism: i.e. unacknowledged copying from or reproduction of published sources or incomplete referencing, including the mis-use of AI-generated content presented for assessment;
- bringing into the assessment or examination room notes in the wrong format (where notes are permitted) or inappropriately annotated texts (e.g. in open book examinations);
- bringing into the examination room or assessment unauthorised material, for example: notes, study guides and personal organisers, own blank paper, calculators;
- bringing into the assessment or examination room any prohibited items, such as dictionaries, instruments which can capture a digital image, electronic dictionaries, translators, wordlists, glossaries, iPods, mobile phones, MP3/4 players, pagers, Smartwatches or other similar electronic devices;
- the unauthorised use of a memory stick or similar device where a learner uses a Word Processor, or any other electronic device or software which is not authorised by GA;
- facilitating malpractice on the part of other learners;
- the alteration or falsification of results documentation, including certificates;
- theft or deliberate destruction of another learner's work.

Note that the above list is not exhaustive.

GA may, at their discretion, impose the following sanctions against learners:

- a) Warning** – The learner may be given a warning by the invigilator or assessor during an examination or assessment to cease the behaviour that is giving rise to concern. This is recorded on the Examination Report Form or in portfolio-based assessment records.
- b) Additional room sweeps and equipment checks during online examinations** – a room sweep and equipment check is always undertaken at the start of an online examination, however, the invigilator may request additional room sweeps and/or equipment checks during the course of the examination.
- c) Loss of all marks for the task** – Where GA cannot guarantee that the results of the examination or assessment are based on that learner's own work. Therefore, they will not receive any marks for that examination or assessment task. (Learners may have the opportunity to retake the exam or assessment at a later date).
- d) Loss of all marks for a unit/component of assessment** (Did Not Fulfil requirements - DNF) – A learner may lose all the marks for the unit being assessed (where applicable). For the purposes of administration, this may be logged on the GA system as 'DNF'.

- e) **Results withheld** - a temporary measure which delays the release of the learner's result(s) while an investigation is on-going when the allegation of malpractice has not been confirmed.
- f) **Results set aside** – a permanent decision that invalidates the results of an examination or assessment because the assessment process was compromised, regardless of who was at fault.
- g) **Disqualification from the examination and/or unit or component of assessment and/or the whole qualification** - There is strong evidence that the learner was involved in malpractice and results for the entire qualification are nullified.
- h) **Learner debarment** – The learner is not permitted to register again for the same qualification for a period of 1 year.

## 7. Appeals Process

Anyone wishing to lodge an appeal against a GA decision to impose a sanction should follow the Appeals Policy & Procedures, available on the GA website.

## 8. Monitoring, Evaluating, and Reporting

Records will be kept by GA of all cases where sanctions are applied within the Malpractice & Maladministration Logs. This information will be used as part of the self-evaluation process undertaken for reporting to the relevant regulatory bodies.

Quarterly reports are presented to the GA Governance Committee.

## 9. Policy Review

This Policy will be reviewed at least every 24 months. Additional updates will be made as and when required.

| Document Specification:   |                                                                                                                                                                                                                                                                                                                              |
|---------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Purpose:                  | To ensure that GA adopts robust procedures for the application of sanctions against centres and individual learners who have been found to have committed maladministration or malpractice during the assessment process for the achievement of a GA qualification, in compliance with the Ofqual Conditions of Recognition. |
| Accountability:           | GA Governance Committee                                                                                                                                                                                                                                                                                                      |
| Responsibility:           | Assessment Manager                                                                                                                                                                                                                                                                                                           |
| Version:                  | 7.3                                                                                                                                                                                                                                                                                                                          |
| Effective from:           | July 2025                                                                                                                                                                                                                                                                                                                    |
| Indicative Review date:   | July 2027                                                                                                                                                                                                                                                                                                                    |
| Links to Ofqual GCR       | A6, A7, A8, B3 and H2                                                                                                                                                                                                                                                                                                        |
| Other relevant documents: | GA Terms and Conditions of Business<br>Centre Assessment Standards Scrutiny (CASS) and General Moderation Policy<br>Regulations for Conducting Controlled Examinations<br>Appeals Policy and Procedure<br>Centre Handbook<br>Whistleblowing Policy                                                                           |