Malpractice and Maladministration Policy & Procedure

1. Scope & Purpose

This policy relates to the prevention, identification, investigation and management of any instances of alleged maladministration and malpractice occurring at any stage in the design, development, delivery or award of Gatehouse Awards ('GA') regulated qualification. It covers GA operating directly as well as via Representative Organisations, its approved centres and learners, and pertains to both paper-based and online based assessments, whether internally or externally assessed, in the UK and internationally.
Unless otherwise specified, references to GA should be interpreted to include any GA Representative.

The purpose of this policy is to:

- Define malpractice and maladministration.
- Describe the procedures to be followed in cases where there is reason to suspect malpractice or maladministration has taken place.
- Describe how GA will ensure that it remains compliant with the Ofqual General Conditions of Recognition at all times, as well as what is expected of its Centres in order to assist in maintaining that compliance.
- Set out the roles and responsibilities for GA, its Centres and learners in respect of the prevention, identification, investigation and management of any instances of alleged or potential maladministration or malpractice.

2. Definitions of Malpractice, Maladministration and Adverse Effect

Malpractice and maladministration are described by Ofqual as "two distinct but related concepts" and refer to any acts or omissions of anyone involved in the development, delivery or award of a qualification that could potentially have an adverse effect on the integrity of the qualification. These can include, but not be limited to:

- GA staff or management involved in the development of qualifications and assessments
- GA or centre staff or management involved in the delivery of assessments, e.g. invigilators, interlocutors and assessors
- GA or centre staff or management involved in the quality assurance of qualifications, e.g. internal quality assurers, moderators/verifiers and external quality assurers
- Centre staff involved in the administration of qualifications, e.g. registration of learners, claiming of certificates, etc.
- GA staff involved in the administration of qualifications, particularly in respect of issuing certificates
- Learners undertaking GA qualifications

Malpractice is generally more likely than maladministration to have the potential for more serious adverse effects to occur, whether for the learner, the centre, GA or the integrity of regulated qualifications, centres and learners. As such, GA treats all cases of potential malpractice very seriously.

GA will also apply similar standards to breaches of the Centre Agreement, treating actions by a Centre which contravene clauses in that Agreement as maladministration or malpractice, as appropriate. Centres should be aware of their responsibilities under that Agreement and ensure that they abide by the same at all times.

2.1. Malpractice

Malpractice will generally involve some form of intent on the part of an individual or group of people to subvert the integrity of an assessment and/or qualification. It may also include circumstances where an individual has been negligent or reckless as to the consequences of their actions. Malpractice could include where a conscious decision has been taken that the individual knows would be maladministration, such as not following the laid down policies and procedures. Malpractice will generally have caused, or have the potential to cause, an adverse effect on the qualification development process, assessment process, the award of the qualification or the integrity or security of any examination or qualification made available by GA.

Malpractice can include where a centre fails to inform GA of any suspicions of malpractice or maladministration or attempts to deny, alter or conceal any evidence pertaining to such suspicions when these are presented to them – including 'coaching' of learners or staff in respect of responses to give during any investigative interviews conducted by GA.

2.2. Maladministration

Maladministration generally covers mistakes or poor process where there has been no intention on the part of the individual to do any harm. It may involve some degree of incompetence or ineptitude, or may result from carelessness or inexperience. An instance of potential maladministration may be escalated to malpractice if:

- the investigation into maladministration is obstructed
- an Action Plan laid down by GA is not adhered to
- repeated instances of maladministration events indicate that it is an endemic issue

Examples of maladministration and malpractice can be seen in Appendix 1.

2.3. Adverse Effect

Ofqual define an Adverse Effect as *"An act, omission, event, incident, or circumstance has an Adverse Effect if it:*

(a) gives rise to prejudice to learners or potential learners, or

(b) adversely affects:

(i) the ability of the awarding organisation to undertake the development, delivery or award of qualifications in a way that complies with its Conditions of Recognition,

(ii) the standards of qualifications which the awarding organisation makes available or proposes to make available, or

(iii) public confidence in qualifications."

Any instance of malpractice or maladministration may lead to an adverse effect.

3. Prevention of Malpractice & Maladministration

GA is committed to taking all reasonable steps to prevent malpractice and maladministration by focussing on proactive risk management and having robust systems and clear accountability throughout the qualification lifecycle. This includes, but is not limited to:

- Using secure and varied assessment methods to reduce predictability and opportunities for malpractice

- Ensuring all assessments are valid, reliable and manageable across diverse settings
- Implementing robust mechanisms for the authentication of learner work, such as via supervised assessments or digital verification
- Maintaining clear mark schemes and rigorous external quality assurance (EQA) processes – such as moderation and verification – to detect anomalies, particularly for those qualifications which are subject to the Centre Assessment Standards Scrutiny (CASS) strategy
- Providing centres with adequate resources, clear guidance and proactive oversight, including targeted training where appropriate
- Leveraging technology and data analytics to monitor delivery patterns and flag irregularities

The prevention of maladministration and malpractice is enforced by signed agreements requiring all parties to adhere to all qualification standards and comply with all GA policies and procedures.

Situations brought to GA's attention by the Regulators

Where the Regulators notify us of failures that have been discovered in the assessment process of another Awarding Organisation, we will review if a similar failure could affect our own assessment processes and arrangements.

4. Identification and Reporting of Cases of Malpractice and Maladministration

All GA staff involved in assessment delivery, marking, or EQA are required to identify any evidence of potential or actual malpractice and to report their findings directly to the Assessment Manager.

A number of internal mechanisms are in place to allow for the identification and reporting of potential or actual instances of malpractice or maladministration by GA staff, including but not limited to Examination Report Forms, marking and moderation records, and EQA reports. We may also identify instances when we apply our processes and policies, e.g. when considering an enquiry about a result, hearing an appeal or investigating a complaint.

Anyone may identify or report potential or actual malpractice or maladministration at any time, including centre staff, learners, and other interested third parties. Therefore, other forms of notifications will also be accepted. No format for written concerns has been given to avoid unintentionally directing the style and content of such submissions. It is for the individual to decide the format and content of the report. Where there is evidence to support or refute any allegation, this should also be submitted. Receipt of the allegation will be acknowledged where appropriate. The presence or absence of supporting evidence, and the reporter's willingness to engage with any follow-up requests for clarification or further information, will be relevant factors in GA's assessment of the report under the Investigation Procedure below.

Regardless of the identity of the person reporting an allegation, the reporting should take place immediately after becoming aware that a potential or actual maladministration or malpractice event has occurred. Where an immediate report had not been possible, the person reporting should also state why this was the case.

Sometimes a person making an allegation of malpractice or maladministration may wish to remain anonymous. An informant who is concerned that possible adverse consequences may occur if their identity is revealed to another party should notify GA. Although GA will always aim to keep an informant's identity confidential where asked to do so, the person must also understand that they may be identifiable by others due to the nature or circumstances of the disclosure and GA is unable to provide any guarantee. In addition, GA may need to disclose an informant's identity if the matter leads to issues that need to be taken up by other parties such as the police, fraud prevention agencies or other law enforcement agencies, the courts (regarding any court proceedings) or Regulators.

Where an informant's identity cannot be verified, or they cannot subsequently be contacted to clarify details or provide further evidence, this may limit the extent to which GA is able to substantiate the allegation. This will be taken into account when GA assesses the report under the Investigation Procedure below.

5. Investigation Procedure

Alleged incidents will be acknowledged, where appropriate. The allegation will be reviewed, along with any immediate supporting evidence assessed, and we will determine whether any further action is required.

In assessing an allegation and determining what further action, if any, is required, GA will have regard to factors relevant to the credibility and reliability of the report. These may include, but are not limited to:

- whether the identity of the reporter is verifiable, or the reporter is anonymous or uses an unverifiable identity;
- whether the reporter engages with reasonable requests for further information or evidence, or fails to respond;
- whether contact details provided (such as an email address) prove to be invalid, non-functioning, or result in bounced communications;
- whether the allegation contains significant factual inaccuracies regarding GA's processes, systems, approved centres, or the qualifications a centre is approved to deliver;
- whether the allegation is accompanied by supporting evidence, or relies solely on unverified assertions;
- whether the tone or content of the communication suggests an intent to pressure GA through reputational threats (for example, threatened referral to the media) rather than a good-faith disclosure;
- whether similar or related allegations have previously been received, investigated, and found to be unsubstantiated;
- whether there are any other indicators consistent with vexatious, malicious, or reputationally motivated reporting, as opposed to a genuine disclosure of malpractice or maladministration.

No single factor is determinative on its own; GA will exercise judgement based on the overall pattern presented. Where, having considered these factors, GA is not satisfied that further investigation is warranted, this will be recorded, and the matter may be reviewed again if credible new evidence is subsequently provided.

Where, having considered the factors set out above, GA has reason to believe that an allegation is unlikely to be capable of substantiation, or is malicious or vexatious in nature, GA may decide not to pursue further investigation without this being escalated to a full investigation. The reporter (where their identity and contact details are known) will be informed of this decision and the reasons for it, so far as this can be done without compromising confidentiality obligations. This decision does not prevent GA from reopening the matter at any time should credible new evidence subsequently come to light,and does not affect GA's separate obligations to notify the Regulator of matters that independently meet the threshold for disclosure under this policy.

Where appropriate, the case will be referred for full investigation by the Assessment Manager, ensuring that the investigator has no personal interest in outcome of the investigation and no prior involvement with the specific incident.

GA will promptly inform the Regulator of all cases of suspected malpractice and maladministration which are likely to have an adverse effect.

Where appropriate, GA will also inform all other relevant Awarding Organisations, affected learners, and other relevant third parties.

When an allegation of malpractice on the part of a learner undertaking and/or a centre delivering a GA qualification has been received, GA will:

- Refer the allegation to the Lead EQA or Assessment Manager who will assess, having regard to the credibility factors set out above, whether the allegation has potential merit
- Where an allegation is assessed as having potential merit, GA will formally open a malpractice investigation and create a record in the Malpractice Database
- Determine any immediate actions necessary to protect the integrity of assessments, learners, qualifications or certification, pending the outcome of the investigation.
- Impose interim measures, where considered necessary and proportionate, pending the outcome of the investigation. Interim measures are precautionary and do not imply that malpractice has been proven. The types of interim measures that may be imposed include:
    - withholding results of an assessment;
    - suspending certification for the learner(s);
    - suspending registration or examination bookings to reduce the risk to other learners;
    - scheduling a visit or an observation, either with or without prior notice being provided to the Centre, proportionate to the level of risk identified;
    - temporarily suspending specific members of staff, etc.
- Notify the centre and/or other relevant parties that an investigation has been opened and provide details of the allegation, usually within 10 working days of the receipt of the allegation, unless such notification would undermine the integrity or the effectiveness of the investigation
- Request all records, data and any other information relevant to the investigation where these are not already at GA's disposal
- Take reasonable steps to secure and preserve evidence relevant to the investigation, including assessment materials, learner evidence, examination records, communications, system logs and any other relevant information.
- Require the centre, learners and any other relevant parties to cooperate fully with the investigation and provide access to records, personnel, systems and information reasonably requested by GA.
- Conduct a thorough investigation involving all the relevant parties, including but not limited to the review of all records, data and any other information, interviews, external quality assurance activities and any video recordings, where available
- Provide an update on the investigation to any relevant parties within 20 working days of the investigation commencing and thereafter at reasonable intervals until the investigation is concluded
- Use all the information available to establish the facts, cause and scale of any irregularities which come to light

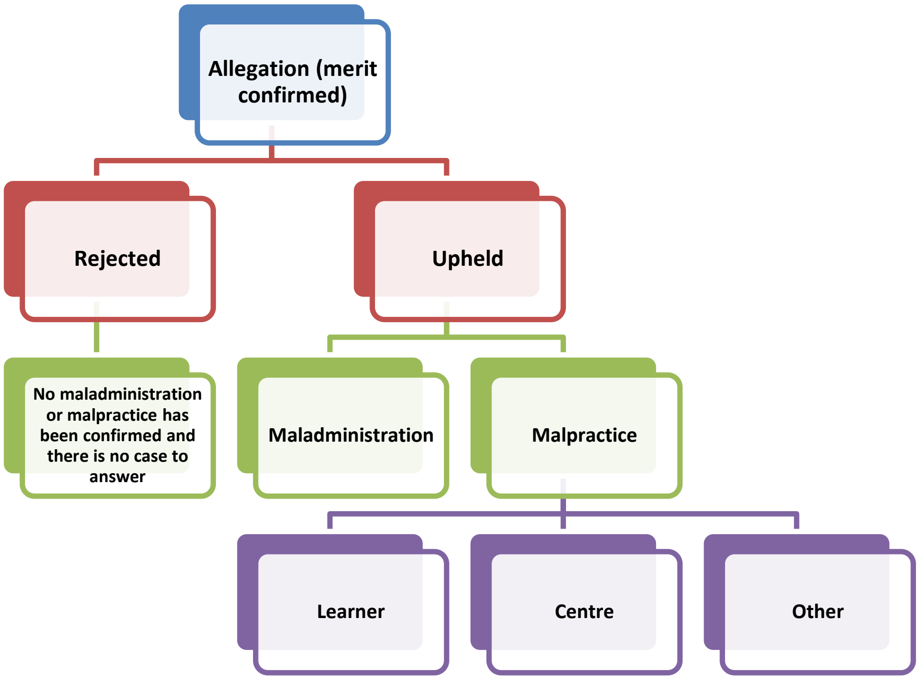
- Maintain sensitivity to the effect on and the reputation of a centre and/or those members of staff or other individuals who may be subject to investigation

- Consider the evidence gathered, determine on the balanced of probabilities whether malpractice or maladministration has occurred and whether that has led to any adverse effects.

In exceptional circumstances, a Regulator may direct GA to undertake specific investigative steps or may assume responsibility for all or part of an investigation. GA will comply with any such directions and cooperate fully with the Regulator.

6. Investigation Outcomes and Reporting

The Investigator will make the final decision on the outcome of the investigation, based on the balance of probabilities. The possible outcomes are as follows:



Where it has been established that, on the balance of probabilities, maladministration and/or malpractice has occurred, GA will take proportionate action to protect the learner(s), GA's qualification(s) and / or GA's reputation or the wider reputation of regulated qualifications, whether in a specific sector or more generally.

Where malpractice has been established, GA may impose one or more of the following sanctions:

- Results may not be released
- Certificates may not be awarded or, if already issued, may be revoked
- The learner may not be permitted to register for any future qualifications or units

Other sanctions may be applied to the centre, or to individual members of centre staff, in line with the GA Sanctions Policy

The final decision will be recorded on the GA Malpractice Database and communicated, together with any subsequent actions, to the relevant parties. It should be noted that the normal process is not to contact the learners directly, but to allow the centre to contact them and keep them informed of the situation and how it affects their assessment, results and/or certification. The exception to this would be where a centre has closed or has had their GA approval revoked entirely due to the seriousness of the issues identified.

Where appropriate, GA may also share details of the findings with other Awarding Organisations, the Regulator and any other regulatory, statutory, professional, legal or law enforcement body, in accordance with applicable data protection legislation and privacy requirements.

GA may use information arising from malpractice and maladministration cases to provide guidance, training or information to Approved Centres. Where possible, such information will be anonymised. However, GA reserves the right to identify a centre or individual where this is necessary to comply with regulatory obligations, protect learners, protect the integrity of qualifications, or where the information is already lawfully in the public domain.

Where evidence suggests that concerns may extend beyond the scope of the original allegation, GA may initiate further investigations at the same centre or at other centres. Additional sanctions or remedial actions may be imposed where appropriate.

7. Rationale for the Application of Sanctions

When determining whether to impose sanctions and, if so, the nature and extent of those sanctions, GA will act reasonably and proportionately, having regard to all relevant circumstances, including:

- The nature, seriousness and scale of the maladministration or malpractice
- The impact, actual or potential, on learners, assessment outcomes, the integrity of qualifications and public confidence in regulated qualifications
- Whether the issue affects a single learner, assessment, unit or qualification, or is more widespread in nature
- Whether the act or omission was deliberate, negligent, reckless or inadvertent
- Whether the centre itself has identified the problem and has taken steps to address it
- The level of cooperation provided during the investigation
- Whether there is any history of previous non-compliance, maladministration or malpractice by the individual or centre
- The risk of the issue recurring if no action is taken
- The extent to which the incident may adversely affect learners, the reputation of GA, public confidence in regulated qualifications, or the confidence of Regulators, employers, higher education institutions or other stakeholders.

GA may impose sanctions, require corrective actions, or take other measures it considers necessary and proportionate to protect learners, the integrity of qualifications and public confidence in regulated qualifications.

Where appropriate, GA will seek to work constructively with centres to resolve issues and implement effective corrective actions. However, where the seriousness of the matter requires immediate intervention, GA reserves the right to impose sanctions and other measures without first pursuing informal resolution.

Nothing in this Policy limits or restricts GA's rights under its Terms and Conditions of Business, Centre Agreement, Centre Handbook or any other applicable agreement, including the right to suspend or terminate a centre's approval or contractual relationship where GA considers this necessary and proportionate.

8. Appeals Process

Any person or organisation wishing to appeal against a decision made by GA under this Policy must do so in accordance with the GA Appeals Policy and Procedures.

Appeals relating to malpractice or maladministration investigations will ordinarily be managed through the Approved Centre. Where a decision affects one or more learners registered with an Approved Centre, GA will normally require the appeal to be submitted by the centre on behalf of the affected learner(s), together with any supporting evidence.

Organisations and individuals may appeal against decisions arising from a malpractice or maladministration investigation on one or more of the following grounds:

- bias or perceived bias in the investigation or decision-making process;
- failure to follow published policies and procedures;
- failure to consider relevant information that was available at the time the decision was made;
- administrative error or irregularity; or
- the proportionality of any sanction or action imposed.

An appeal must be submitted in writing to compliance@gatehouseawards.org no later than 20 working days after the outcome of the investigation is communicated by GA.

Where a malpractice or maladministration investigation concerns a cohort of learners, a qualification, a centre-wide issue, or sanctions imposed on an Approved Centre, GA will not normally consider individual learner appeals until:

- the malpractice or maladministration investigation has been concluded;
- any sanctions have been determined and communicated; and
- the centre has exhausted all applicable review and appeal rights available under this Policy and the GA Appeals Policy and Procedures.

This is to ensure that all relevant evidence is considered, that decisions affecting multiple learners are dealt with consistently, and that individual appeals do not prejudice ongoing investigations or related appeal processes.

Nothing in this Policy prevents GA from considering an appeal from an individual learner where required by regulatory requirements or where GA considers there are exceptional circumstances that justify doing so.

Appellants should refer to the GA Appeals Policy and Procedures, available on the GA website, for full details of the appeals process.

The appeal will consider whether the original decision and any resulting sanctions were reasonable, proportionate and consistent with GA policies, regulatory requirements and the evidence available.

9. Monitoring, Evaluating and Reporting

Records will be kept of all cases of malpractice and maladministration. Information regarding the number and nature of cases, together with their outcomes, are reviewed by the Governance Committee and included in the review as part of preparing the Annual Statement of Compliance for submission to the Regulator.

GA will also use this information to identify any potential trends which may point towards a weakness in a particular centre, qualification, assessment or assessment methodology, policy or procedure.

This policy is monitored as follows:

- A record of all reported incidents of malpractice and maladministration, whether proven or not, is kept by GA
- Stored data is regularly reviewed to identify emerging themes, assess risk and determine actions for mitigation
- Operation of the policy is reported to the Governance Committee
- Reports are made to the Governance Committee as part of the self-assessment procedure
- Guidance from the Regulators is reviewed and the policy is updated to comply with best practice

9.1. Reporting to the Regulator

Should GA or its centres fail to meet its obligations under the General Conditions of Recognition, particularly in relation to the prevention of maladministration and malpractice leading to an Adverse Effect, we are required to notify the Regulator. Failure to do so is, in itself, a breach of the General Conditions of Recognition which we may be required to declare within our Annual Statement of Compliance submission to the Regulator. Under the Centre Agreement all centres are made aware of their obligations, including the specific duty not to put GA in breach of our ability to fulfil our obligations under the General Conditions of Recognition. It is therefore important that Adverse Effects, maladministration and / or malpractice are reported without delay, whether by GA staff or Centre staff who identify it, so that it can be dealt with appropriately.

10. Summary of Roles and Responsibilities

Centres are required to:

- Have a robust written malpractice and maladministration procedures in place to minimise the risk of maladministration and / or malpractice from occurring and outline the centre's approach to the identification, internal investigation, reporting and responding to malpractice and maladministration
- Ensure that all staff and learners are aware of, and familiar with, the contents of GA's and the centre's policies and procedures related to malpractice and maladministration, sanctions and appeals
- Notify GA immediately of any potential maladministration and / or malpractice
- Comply with all requests for information in the timescales stated by GA
- Carry out an investigation, where appropriate and/or as directed by GA, whilst acknowledging that an investigation carried out by the Centre will not be taken in isolation but used as part of the wider investigation into the incident

- Provide GA with a written report of any investigation it undertakes (whether or not the investigation was requested by GA), including information on the detail and outcome(s) of that investigation
- Fully co-operate with any investigation
- Implement required actions as a result of the investigation
- Inform centre staff, satellites centres (including examination venues, where applicable) and learners affected of the implications of any actions and sanctions
- Take appropriate action to prevent the incident of suspected or actual maladministration and/or malpractice reoccurring
- Notify GA if any personnel involved in the maladministration and/or malpractice leave the centre
- Retain any relevant documentation securely in line with the centre's archiving and retention policies and procedures
- Respect the confidentiality of information the centre handles and comply with any associated data protection legislation.

GA will:

- Ensure that all staff involved in the design, delivery, management, administration, assessment and quality assurance of GA qualifications are aware of, and familiar with, the contents of this policy
- Take all reasonable steps to prevent or mitigate the impact and effects of maladministration and/or malpractice
- Support centres and, where requested, provide centres with guidance on how best to investigate, deal with and prevent maladministration and/or malpractice
- Provide centres with a report / summary on the outcome of the investigation
- Apply appropriate sanctions in line with our Sanctions Policy
- Work with centres, as appropriate, to ensure that maladministration and/or malpractice doesn't reoccur
- Inform other relevant third parties as appropriate
- Retain records and documentation during and after the completion of investigations in line with all relevant data protection and privacy legislation.

11. Fees for Malpractice/Maladministration Investigations*

GA reserves the right to charge a centre for the cost of any resits and reissue of certificates and/or additional quality assurance activities/centre monitoring visits undertaken as part of a malpractice investigation. The following list gives the standard fees which may be applied; however, this is not exhaustive, and other charges may also be applied depending on the complexity and severity of the case. These fees can also be applied to centres who have had their approval revoked entirely due to malpractice and will be subject to the same invoicing policy, including debt recovery actions.

Item	Fee
Initial desk-based investigation	£nil
Initial visit to centre a) as part of a malpractice investigation OR b) as part of an action plan resulting from a malpractice investigation. (face to face or remote)	£470, plus reasonable expenses, where applicable (not applied if allegation is not partially or fully upheld) The above fee is inclusive of the first exam observation, where relevant.
Retesting by GA (face to face or remote)	£70 per hour or part thereof, per staff member, plus reasonable expenses, where applicable
Retesting under GA observation (face to face or remote)	£50 per hour or part thereof, per staff member, plus reasonable expenses, where applicable
Further observations required by Action Plan and/or implementation of Sanctions	£50 per hour or part thereof, per staff member, plus reasonable expenses, where applicable
Further face to face or remote visits required by Action Plan and/or implementation of Sanctions	£400 per visit, plus reasonable expenses, where applicable.

**Please note, the fees listed above relate to UK-based Centres. Fees for International Centres are available upon request.*

12. Mandatory Disclosure

It is imperative that the integrity of qualifications is maintained and that qualifications are awarded only to learners who have legitimately met the relevant requirements.

GA recognises that Approved Centres often work with multiple Awarding Organisations (AOs) and that, where malpractice, maladministration or other compliance concerns arise, more than one AO may be affected. To protect the integrity of regulated qualifications, GA is required by its Regulators to report certain events, findings and sanctions to the relevant Regulator(s) and, where appropriate, to other Awarding Organisations that may be affected.

Depending on the nature and seriousness of the matter, GA may also be required to notify its Regulator(s) of actual or potential breaches of the General Conditions of Recognition or other regulatory requirements. Such notifications may arise where an act or omission by a centre, its staff, contractors or learners has affected, or may affect, GA's compliance with those requirements.

Document Specification:	
Purpose:	To ensure that Gatehouse Awards (GA) adopts robust procedures for preventing, investigating and dealing with malpractice and maladministration relating to the development, delivery and award of its qualifications, in compliance with the Ofqual conditions of recognition.
Accountability:	GA Governance Committee
Responsibility:	Assessment Manager
Version:	13
Effective from:	September 2026
Indicative Review date:	September 2028
Links to Ofqual GCR	A6, A7, A8, B3, C1, C2, H, I4.2 and PR
Other relevant documents:	Gatehouse Awards Terms and Conditions of Business Centre Assessment Standards Scrutiny (CASS) Sanctions Policy Regulations for Conducting Controlled Examinations Appeals Policy and Procedure Centre Handbook Whistleblowing Policy

Examples of Malpractice

The following list provides examples of centre and candidate malpractice. This list is not exhaustive and is intended as guidance on GA's definition of malpractice.

- Deliberate failure to adhere to GA's centre approval and/or qualification approval criteria or failure to complete action plans assigned to the centre within stated timelines
- Denial of access to premises, records, information, learners and staff by GA, any authorised GA representative and/or the regulatory authorities
- Inadequate centre procedures for the induction of staff or any contracted person involved in the delivery of qualifications
- Failure to carry out internal and external assessment, including moderation, in accordance with GA's requirements
- Deliberate failure to adhere to GA's learner registration and certification procedures
- Making a fraudulent claim for certificates
- Making claims for certificates for learners who have yet to complete the required work or assessments in order to achieve the qualification in question
- Intentional withholding of information from GA which is critical to maintaining the rigour of quality assurance and standards of qualifications
- Deliberate misuse of GA's logo and trademarks or misrepresentation of a centre's relationship with GA and/or its recognition and approval status with GA
- Introduction or allowing of unauthorised material into an assessment room
- Deliberate contravention by a centre and/or its learners of the assessment arrangements as specified for GA qualifications
- Loss of, theft of, or a breach of confidentiality in any assessment materials
- Plagiarism and copying of any nature by learners and/or staff (including the misuse of AI or other technology to do so)
- Personation - assuming the identity of another learner or having someone assume the identity of the named learner during an assessment
- Deliberate collusion, falsification, fabrication or forgery of assessment evidence and learners' scripts, records or authentication statements by centres or other learners
- Unauthorised amendment, copying or distributing of exam/assessment papers/materials
- Inappropriate assistance to learners by centre staff (e.g. unfairly helping them to pass an exam, unit or qualification assessment)
- Deliberate submission of false information to gain a qualification or pass an exam
- Deliberate failure to adhere to, or attempts to circumnavigate the requirements of GA's Candidate Access Policy
- False ID used at the registration or any other stage
- Selling papers/assessment details/certificates
- Failure to identify, record, manage and mitigate conflicts of interest
- Failure to provide learners and staff, including contractors, with the knowledge of their responsibilities through policies and procedures
- Systemic and repeated failure to review systems, policies and procedures to ensure they remain fit for purpose, particularly when previously being advised to do so by GA or its representatives
- Inaccurate recording of learner assessment decisions leading to invalid claims for certification
- Deliberate destruction of another's work

- Obtaining examination or assessment material without authorisation
- Obtaining, receiving, exchanging or passing on information during an assessment (or the attempt to) by any means
- Failure to follow a centre's own malpractice and maladministration policy and/or report occurrences to GA
- Non-compliance with invigilation requirements during assessments
- Failing to keep assessment papers secure prior to assessment
- Withholding of information from GA, by deliberate act or omission, which is required to assure GA of the centre's ability to deliver qualifications appropriately
- Persistent instances of maladministration within a centre
- The use of AI in any work submitted for qualifications assessment without appropriate referencing (see Appendix 2, Guidance on the use of AI in Assessments)
- Centre's failure to recognise and / or prevent the use of AI by learners
- Centre's failure to issue clear guidance to learners on the use of AI in assessment
- Centre producing or allowing the production of their own certificate claiming the certificate as one issued by GA

Examples of Maladministration

The following list provides examples of centre and candidate maladministration. This list is not exhaustive and is intended as guidance on GA's definition of maladministration. The following examples will only remain classed as Maladministration where they are one-off or very occasional errors. Repeated or serious errors may be escalated to Malpractice.

- Failure to adhere to GA's learner registration and certification procedures
- Failure to adhere to GA policies, procedures and practices
- Failure to adhere to GA's centre agreement and/or qualification requirements and/or associated actions assigned to the centre
- Late registration of learners
- Unreasonable delays in responding to requests and/or communications from GA
- Inaccurate claims for certificates
- Use of unapproved satellite centre or examination venue
- Failure to have relevant resources and/or equipment available for the purpose of assessment
- Failure to maintain appropriate auditable records, e.g. certification claims
- Misuse of the GA logo and trademarks or misrepresentation of a centre's relationship with GA and/or its recognition and approval status with regard to GA qualifications. GA may take legal action if centres fail to cooperate with reasonable GA requests
- Failure to adhere to, or to circumnavigate, the requirements of GA's Candidate Access Policy
- Failure to adhere to GA's financial payment terms and/or plans (whether infrequent or persistent)
- Misuse of the Ofqual Logo on websites or other centre materials

Guidance on the Use of AI (Artificial Intelligence) in Assessments

Learners' use of AI when producing work submitted for assessments can be considered a form or malpractice. Without appropriate referencing, use of AI is considered to be a form of plagiarism and is subject to sanctions, including disqualification and possible debarment.
Examples of AI misuse include, but are not limited to the following:

- Copying or paraphrasing whole responses of AI generated content
- Copying or paraphrasing sections of AI generated content
- Using AI to complete parts of the assessment where this is explicitly against assessment instructions
- Failing to acknowledge use of AI tools
- Incomplete or poor referencing of AI tools

For assessments where the use of internet sources is permitted, learners must continue to ensure that the work submitted for assessment is demonstrably their own. If any sections of their work are produced using AI generated responses, they must be identified and referenced.
Centre staff must provide instructions to learners on how to reference the use of AI, where the assessment permits the use of AI sources in the creation of academic work.
To reference use of AI, it is expected that the centre instructs learners to acknowledge, describe and reference its use in the following way:

- Name and version of the generative AI system used; e.g. ChatGPT-3.5
- Publisher (company that made the AI system); e.g. OpenAI
- URL of the AI system.
- Brief description (single sentence) of context in which the tool was used.

For example: *I acknowledge the use of ChatGPT 3.5 (Open AI, https://chat.openai.com) to summarise my initial notes and to proofread my final draft.*

It is also recommended that the learner retains a copy of the questions and AI generated responses for reference and authentication purposes, in a non-editable format (for example a screenshot), to be submitted with their work so that the teacher/assessor is able to review the AI generated content and how it has been used.

Learners must be aware that if they use AI to the extent that they have not independently met the marking criteria, they will not be deemed to have met the criteria for the qualification and so will not be awarded a passing grade.

GA has published a guidance document for learners - *Information for Learners: AI Use in Coursework* (available on the Learner Information page of the GA website) - which centre staff may find useful to share with learners before beginning their assessments. Centres are responsible for ensuring learners have read and understood the key requirements and expectations with regards to the use and misuse of AI.

For further guidance for centres and learners, please refer to the JCQ AI Use in Assessments: Protecting the Integrity of Qualifications document and other guidance available on the JCQ website at www.jcq.org.uk, as well as *GA Guidance for Centres: Preventing and Identifying AI Misuse in Assessment*