

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 requirements for delivering qualifications in accordance with the relevant regulations. The aim of this policy is to safeguard the integrity of Gatehouse Awards qualifications, whilst avoiding any unnecessary or unduly burdensome requirements on Approved Centres.

Sanctions may be imposed in order 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 Candidates and the potential threat to the integrity of the qualification. Gatehouse Awards 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 Gatehouse Awards for advice and guidance as soon as problems are identified. Gatehouse Awards will take whatever action is necessary to protect Candidates, standards, and confidence in regulated qualifications.

3. Application of Sanctions

- Any allegation, suspicion or report will be dealt with in line with the current Gatehouse Awards Malpractice & Maladministration Policy
- Gatehouse Awards will give notice of its decision and the date that the sanction is to be applied
- Depending on the severity of the case, Gatehouse Awards may make transitional arrangements, particularly where Candidates may be affected
- In extremely serious cases, Gatehouse Awards reserves the right to take immediate action in order to protect Candidates or standards

- Centres, and where applicable individual candidates, have the right to appeal against any sanctions proposed or already imposed in line with the Gatehouse Awards Appeals Policy and Procedure
- If necessary, Gatehouse Awards may seek the co-operation of appropriate third parties in taking action
- If necessary, Gatehouse Awards 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, Gatehouse Awards 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 Gatehouse Awards will take will depend on the impact and risks associated with the problem. The following will be considered:

- The impact on Candidates 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 candidate, concerned
- The level of adverse effect the incident may have on the Candidate, the integrity of the exam, public confidence in Gatehouse Awards qualifications or regulated qualifications as an industry, the reputation of Gatehouse Awards with the public and/or relevant regulators
- The level of cooperation shown by the Centre, or, where applicable, an individual candidate during the course of the investigation

4.1 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) Centre’s policies, procedures and assessment practices, and responsibilities of personnel are not clear or well understood by centre’s assessment, quality assurance and compliance team b) use of staff who do not meet the minimum requirements as stipulated by Gatehouse Awards (where applicable)	Level 1- Entry in action plan	Non-compliance with Centre Approval but no threat to the integrity of assessment decisions.	Gatehouse Awards is satisfied that the Centre has taken all the necessary steps to resolve the issues and prevent recurrence
2. Changes to key personnel, including Directors, not communicated to Gatehouse Awards			

Non-compliance issue	Sanction	Rationale	Sanction lifted when:
<ol style="list-style-type: none"> 1. Centre fails to keep accurate or complete records to allow a full audit to be carried out by Gatehouse Awards External Quality Assurance 2. Previously agreed corrective measures relating to Level 1 have not been implemented 3. Centre persistently fails to respond to communications from Gatehouse Awards or its representatives in a timely manner 4. Allegation of malpractice in which the Centre's complicity may or may not be confirmed 5. Allegation of malpractice resulting from the Centre's negligence 6. The Centre fails to pay invoices as they fall due 	<p>Level 2 – Entry in action plan, and, if appropriate, more frequent moderation of qualification submissions and withholding of certification until issue resolved</p> <p>Centre is not allowed to expand (i.e. open Satellites, etc.) while Sanction is in place</p>	<p>a) Close scrutiny of the Centre's processes and procedures, plus their understanding of their responsibilities is required</p>	<p>Gatehouse Awards 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"> 1. Discrepancies in the records or recordings submitted for marking indicating Candidates have been advantaged or disadvantaged in some way 2. Centre fails to provide access to requested records, information, Candidates and staff in a timely manner 3. Allegation of malpractice in which the Centre's complicity has been, or is likely to be confirmed 4. Qualification submissions show serious anomalies 5. Previously agreed corrective measures relating to Level 2 non-compliance are not implemented 6. Security of examination papers has been compromised or breached but restricted to Centre level 7. Failure to effectively quality assure satellite locations 	<p>Level 3 – As for Level 2 above, plus suspension of staff and/or suspension of the Centre's ability to deliver assessments until Gatehouse Awards are satisfied that standards are at approved levels (if visits are required they might be done 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 Candidates</p> <p>b) The integrity of the assessment practices is compromised</p>	<p>Gatehouse Awards is satisfied that the Centre has taken all the necessary steps to resolve the issues and prevent recurrence. In addition, any Candidates 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"> 1. Significant faults in the management and compliance for a qualification 2. Serious allegations of malpractice have been raised in which the evidence shows that, on the balance of probability, the Centre has been 	<p>Level 4 – 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:
<p>complicit, affecting the integrity of the assessment and posing a risk to the reputation of Gatehouse Awards, as well as an adverse effect on the candidate</p> <ol style="list-style-type: none"> 3. Previously agreed corrective measures relating to Level 3 non-compliance have not been implemented 4. Security of examination papers has been compromised or breached on a regional, national or international level 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.</p>	<p>specific qualifications</p>	<p>the management of the Centre as to how they intend to remain compliant in future.</p>
<ol style="list-style-type: none"> 1. Significant faults in the management and compliance of some or all Gatehouse Awards qualifications 2. Previously agreed corrective measures relating to Level 4 non-compliance are not implemented 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 4. Centre refuses to cooperate with an Gatehouse Awards investigation, including (but not limited to): <ul style="list-style-type: none"> • Refusing access to premises to Examination Observers or External Quality Assurers (whether announced or unannounced) • Refusing access to candidate or relevant staff files during an investigation • Refusing to provide candidate contact details • Deliberately putting obstacles in the way of the investigation or divert the focus of the investigation in an effort to conceal evidence of malpractice 	<p>Level 5 – Permanent withdrawal of Centre Approval for all Gatehouse Awards qualifications including informing other relevant Awarding Organisations, Ofqual and any other affected third parties as required</p>	<p>In the opinion of Gatehouse Awards, 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 Gatehouse Awards</p>	<p>Not Applicable. If a Centre has reached a Level 5 Sanction, this cannot be lifted.</p>

Non-compliance issue	Sanction	Rationale	Sanction lifted when:
5. The Centre attempts to influence the outcome of the result is either endemic and / or supported by senior management.			

4.2 Sanctions applied to individual Candidates

GA will determine the application of a sanction or penalty 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.

This document outlines how the sanctions and penalties might be applied.

GA may, at their discretion, impose the following sanctions against candidates.

1. Warning (given during the examination by delivery staff and recorded in ERF)
2. Additional room sweeps and equipment checks during online examinations
3. Loss of all marks for the task
4. Loss of all marks for a unit (DNF)
5. Results withheld (the results for the entire examination are not released due to insufficient evidence of validity – followed by an offer to take the examination again under observed conditions)
6. Results set aside – if a candidate is not willing to participate in an observed retake examination within a timescale specified by GA, their results will be permanently set aside.
7. Disqualification from a unit / component (the results for the unit / component examination are not released due to sufficient evidence of malpractice being identified)
8. Disqualification from a whole qualification (the results for the entire examination are not released due to due to sufficient evidence of malpractice being identified)
9. Candidate debarral (Candidate is not permitted to register again for the same qualification for a period of 1 year from the date of the exam).

	IMPACT ON THE ASSESSMENT				
Type of issue	No impact on the validity	Possible / minor impact on the validity	Likely impact on the validity	Proof of impact on the validity	Repeated attempts at malpractice
	1. Warning (given during the examination by delivery staff and recorded in ERF)	2. Loss of marks for a task 3. Loss of all marks for a unit (DNF)	4. Results set aside (the results for the entire examination are not released due to insufficient evidence of validity – followed by a free offer to resit) (This criterion does not apply to TIE examinations)	5. Disqualification from a unit / component OR 6. Disqualification the entire examination (the results are not released due to sufficient evidence of malpractice being identified) OR Removing the candidate from the examination session.	7. Candidate debarred (Candidate is not permitted to register again for the same qualification for a period of 1 year from the date of the exam).
A Breach of the instructions or advice of an invigilator, supervisor, or the awarding body in relation to the examination rules and regulations	Warning early on adhered to.	Warning not immediately adhered to. Minor non-compliance: e.g. sitting in a non-designated seat; continuing to write for a short period after being told to stop.	n/a	Warning disregarded or major non-compliance: e.g. refusing to move to a designated seat; significant amount of writing after being told to stop; unauthorised materials discovered by the invigilator.	If this or other type of malpractice repeated in subsequent exam sessions.
B Collusion: working collaboratively with other candidates beyond what is permitted	Attempt noted by the invigilator, no evidence of collusion in the assessment materials. collaborative work is apparent in a few	Minor evidence of collusion in the assessment materials. collaborative work begins to affect the	n/a	Significant evidence of collusion in the assessment materials. candidates' work reflects extensive similarities and identical passages; due to a	If repeated in subsequent exam sessions.

	areas, but possibly due to teacher advice; candidate unaware of the regulations.	examiner's ability to award a fair mark to an individual candidate.		deliberate attempt to share work.	
C Disruptive behaviour in the examination room or assessment session (including use of offensive language).	Minor disruption lasting a short time; calling out, causing noise, turning around.	n/a	n/a	Repeated or prolonged disruption; unacceptably rude remarks; being removed from the examination room; taking another's possessions.	Disruption continued and significantly affected the other candidates in the session, warnings ignored; provocative or aggravated behaviour; repeated or loud offensive comments; physical assault on staff or property.
D Exchanging, obtaining, receiving, passing on information (or the attempt to) which could be assessment related by means of talking, electronic, written or non-verbal communication	Identified prior to or in the first 5 minutes of the exam session. Isolated incidents of talking before the start of the examination or after papers have been collected. Passing/receiving written communications which clearly have no bearing on the assessment.	Identified later but during the exam session. Talking during the examination about matters not related to the exam; Accepting examination related information accepting assessment related information.	Identified post-exam session, no substantiated evidence but further discrepancies indicate that the validity is likely to have been compromised.	Identified post-exam session, plus other evidence to substantiate the claim. Talking about examination related matters during the exam; whispering answers to questions Passing assessment related information to other candidates; helping one another; swapping scripts.	If repeated in subsequent exam sessions.
E Making a false declaration of authenticity	n/a	If identified in prepared tasks but most of the work is still done by the candidate.	If identified in spontaneous tasks or components no substantiated evidence but further	If identified in spontaneous tasks or components plus other evidence to substantiate the claim.	If repeated in subsequent exam sessions.

			discrepancies indicate that the validity is likely to have been compromised. Sections of work done by others, but most still the work of the candidate.	Most or all of the work is not that of the candidate.	
F Plagiarism: unacknowledged copying from or reproduction of published sources (including the internet); incomplete referencing	n/a	Minor amount of plagiarism/poor referencing in places.	Plagiarism from published work listed in the bibliography or referenced; or minor amount of plagiarism from a source not listed in the bibliography or referenced no substantiated evidence but further discrepancies indicate that the validity is likely to have been compromised.	If identified in spontaneous tasks. Plagiarism from published work not listed in the bibliography or referenced; or plagiarised text consists of the substance of the work submitted and the source is listed in the bibliography or referenced.	If repeated in subsequent exam sessions.
G Impersonation	n/a	n/a	If candidate involvement not proven.	If candidate involvement proven. Deliberate use of wrong name or number; personating another individual; arranging to be personated.	If repeated in subsequent exam sessions.
H Being in possession of unauthorised confidential information about an examination or assessment	n/a	n/a	n/a	If candidate involvement proven	If repeated in subsequent exam sessions.

I Bringing into the examination room unauthorised material or notes in the wrong format	Notes/annotations go beyond what is permitted but do not give an advantage; notes irrelevant to subject.	Notes/annotations are relevant and possibly give an unfair advantage but have not been used in the exam.		Notes/annotations are relevant and have been used in the exam.	If repeated in subsequent exam sessions.
J Facilitating malpractice on the part of other candidates	n/a	n/a	n/a	If candidate involvement proven.	If repeated in subsequent exam sessions.
K Alteration or falsification of any results document, including certificates	n/a	n/a	n/a	If candidate involvement proven of Falsification or forgery of any certificate of documentation	If repeated in subsequent exam sessions.
L Theft or deliberate destruction of another candidate's work	n/a	Minor damage to work which does not impair visibility.	Defacing scripts; destruction of candidate's own work.	If candidate involvement proven and significant destruction of another candidate's work or taking somebody else's work (e.g. project/ coursework) to pass it off as one's own.	If repeated in subsequent exam sessions.
M Misuse of examination and assessment materials	n/a	n/a	Accepting assessment related information without reporting it to the awarding organisation.	If candidate involvement proven or the misuse of assessment material or exam related information including: attempting to gain or gaining prior knowledge of assessment information; improper disclosure (including electronic means); receipt of assessment information from the examination room; facilitating malpractice on the part of others; passing or	If repeated in subsequent exam sessions.

				distributing assessment related information to others	
O Mobile phone or similar electronic devices (including iPod, PM3/4 player, memory sticks, Smartphone, Smartwatch)	Not in the candidate's possession but make a noise in the examination room.	In the candidate's possession but no evidence of being used by the candidate.	n/a	In the candidate's possession and evidence of being used by the candidate.	If repeated in subsequent exam sessions.
P Copying from another candidate or allowing work to be copied (including the misuse of technology)	Lending work not knowing it would be copied.	Permitting examination script/work to be copied; showing other candidates' answers.	n/a	Copying from another candidate's script, controlled assessment, non examination assessment.	If repeated in subsequent exam sessions.
Q Behaving in a way as to undermine the integrity of the examination/ assessment	n/a	n/a	n/a	Attempting to obtain certificates fraudulently; attempted bribery; attempting to obtain or supply exam materials fraudulently.	If repeated in subsequent exam sessions.
R Use of social media for the exchange and circulation of real or fake assessment material	n/a	n/a	Accepting/receiving real or fake assessment related information via social media without reporting it to the awarding body	Misuse of assessment material (real or fake) including: attempting to gain or gaining prior knowledge of assessment information via social media; improper disclosure of real or fake assessment information; passing or distributing real or fake assessment related information to others	If repeated in subsequent exam sessions.

5. Reporting Outcomes

A full report of findings will be produced following external quality assurance activity and a copy of the completed report will be sent to all parties concerned.

The Regulator(s) and other Awarding Organisations may receive a copy of the report, depending on the gravity of the case.

6. Appeals Process

Anyone wishing to lodge an appeal against a Gatehouse Awards decision should follow the Appeals Policy & Procedures, available at the Gatehouse Awards website.

7. Monitoring, Evaluating, and Reporting

Records will be kept by Gatehouse Awards 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 will be presented to the Quality Committee and the Governing Body.

8. 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 Gatehouse Awards adopts a robust and consistent approach to the use of Sanctions against Centres and, where applicable, Candidates, in order to ensure compliance with all relevant regulations, legislation and industry standards.
Accountability:	Gatehouse Awards Governing Body
Responsibility:	Compliance Manager
Version:	7.1
Effective from:	July 2021
Indicative Review date:	July 2023
Links to Ofqual GCR	A2.3(e)
Other relevant documents:	Gatehouse Awards Regulations for Conducting Controlled Examinations Gatehouse Awards Terms and Conditions of Business Gatehouse Awards Malpractice and Maladministration Policy & Procedure Gatehouse Awards Centre Handbook Gatehouse Awards Centre Assessment Standards Scrutiny (CASS)