

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 where, in accordance with the GA Malpractice & Maladministration Policy, sufficient evidence has established that malpractice or maladministration has occurred. Sanctions may also be imposed for breaches of non-regulatory business obligations.

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

Where GA determines that a sanction is appropriate, it will:

- notify the relevant Centre, learner or other party of the sanction, the reasons for the decision and the date from which it will apply
- where appropriate, make transitional arrangements to protect the interests of learners affected by the sanction
- specify any actions or conditions that must be met before a temporary sanction can be lifted; and
- monitor compliance with the sanction and any associated requirements

GA may seek the cooperation of relevant third parties where this is necessary to give effect to a sanction.

Sanctions will remain in place until GA is satisfied that any specified conditions for their removal have been met, unless the sanction is permanent.

The relevant party may appeal against a decision to impose a sanction in accordance with the GA Appeals Policy.

4. Determining the Appropriate Sanction

GA will determine the appropriate and proportionate sanction having regard to the circumstances of the individual case. Relevant factors may include:

- the nature, seriousness, scale and duration of the malpractice or maladministration
- the actual or potential impact on learners, assessment integrity or qualification standards
- whether the issue affects one or more qualifications, sites or activities
- whether the conduct was deliberate, negligent, reckless or inadvertent
- whether the Centre or learner identified the issue and took appropriate action to address it
- any previous history of non-compliance, malpractice or maladministration
- whether previous corrective actions or sanctions have been effective
- the level of cooperation shown by the Centre or learner; and
- the likelihood of recurrence.

5. Sanctions Applied to Centres

The sanction levels below are indicative and are not sequential. GA may apply a sanction at any level appropriate to the circumstances of the case. The examples provided are not exhaustive and more than one sanction may be applied where necessary and proportionate.

Level	Indicative circumstances	Possible sanctions
1	Maladministration or malpractice is established but is limited in seriousness or scope, and has not compromised assessment integrity or the validity of assessment decisions. Centre policies, procedures, assessment practices or staff responsibilities are unclear or not consistently understood. Assessment or QA staff do not meet GA requirements. EQA issued action plan has not been fully or effectively implemented. There are repeated failures to respond to GA communications.	Formal warning. The compliance with the EQA issued action plan is formally monitored OR a formal action plan is issued where appropriate. Increased risk rating. Increased monitoring.
2	Maladministration or malpractice is established which has compromised, or has the potential to	As above, plus

	compromise, assessment integrity or the validity of assessment decisions, but the risk can be adequately managed while the Centre continues the affected activity subject to additional controls or restrictions. Records are insufficient or inaccurate to provide appropriate assurance. There has been negligence or a significant failure to follow required assessment or QA arrangements. Previous corrective actions or sanctions have not been effective.	The centre is not allowed to expand (e.g. apply for new satellite locations or qualification approvals). Restrictions on the assessment methods in use. Restrictions on the use of individual staff members.
3	Maladministration or malpractice is established which has seriously compromised, or presents a significant ongoing risk to, assessment integrity or the validity of assessment decisions, requiring significant restrictions or suspension of specified Centre activities to prevent further risk. Persistent or systemic weaknesses in assessment or IQA process have resulted in invalid assessment decisions. Security of examination papers has been compromised at the centre level. The Centre has failed to cooperate adequately with GA or provide required access to records, staff, learners or premises. Previous corrective actions or sanctions have not been effective.	As above, plus Suspension of new learner registrations and/or exam bookings. Suspension (temporary or permanent) of specified sites or satellite locations. Suspension (temporary or permanent) of particular assessment or quality assurance activities. Suspension (temporary or permanent) of specified personnel from undertaking particular roles or activities in relation to GA qualifications.
4	Maladministration or malpractice is established which demonstrates serious breakdown in the integrity, security or compliant delivery of one or more qualifications, such that GA can no longer be sufficiently assured of the Centre's ability to continue delivering the affected qualification(s). Security of examination papers has been compromised at a national or international level. A Centre or its personnel deliberately attempt to improperly influence EQA or other GA quality assurance activity or its outcome.	Withdrawal of approval for one or more qualifications.

	Previous corrective actions or sanctions have not been effective.	
5	Serious or systemic malpractice is established which demonstrates an irretrievable breakdown in the Centre's ability or willingness to comply with GA requirements, such that GA can no longer be sufficiently assured of the Centre's ability to operate as an Approved Centre. The centre's attempts to improperly influence the outcome of an assessment are either endemic and / or supported by senior management. The Centre has deliberately obstructed an investigation or attempted to conceal serious malpractice.	Withdrawal of centre approval.

6. Sanctions applied to individual learners

Where it has been determined that a learner (or multiple learners) have committed malpractice, sanction may be applied to them directly.

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 or, where appropriate, any GA qualification for a period of 1 year or more.

7. Business and Contractual Breaches

Breaches of contractual, commercial or other non-regulatory obligations are separate from malpractice and maladministration and do not require consideration under the GA Malpractice and Maladministration Policy. Examples of such breaches include:

- non-payment of invoices
- failure to comply with agreed payment plans
- breaches of contractual or business agreements
- breaches of intellectual property requirements
- failure to maintain required business or contact information
- failure to comply with contractual notification or reporting requirements
- conduct that adversely affects the business or commercial relationship between GA and a Centre or Representative

Where a Centre, Representative Organisation or other contracted party fails to meet its contractual or commercial obligations, GA may apply reasonable and proportionate business restrictions. These may include, but are not limited to:

- restricting or suspending new learner registrations or exam bookings
- restricting access to services
- declining applications for additional qualifications, approvals or services
- requiring advance payment before further services are provided

Business restrictions applied under this section do not constitute a finding of malpractice or maladministration or a regulatory sanction. Where the circumstances separately give rise to concerns relating to malpractice, maladministration or regulatory compliance, these will be considered under the relevant GA policy.

Nothing in this section limits any contractual or legal rights or remedies available to GA under its Terms and Conditions, Centre Agreements, Representative Agreements or other applicable agreements.

8. 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.

9. 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.

10. 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:	Director
Version:	8
Effective from:	September 2026
Indicative Review date:	September 2028
Links to Ofqual GCR	A6, A7, A8, B3 and H2
Other relevant documents:	GA Terms and Conditions of Business Centre Assessment Standards Scrutiny (CASS) and General Moderation Policy Regulations for Conducting Controlled Examinations Appeals Policy and Procedure Centre Handbook Whistleblowing Policy