



BBE
TRAINING



A CITRUS GROUP
COMPANY

Malpractice & Maladministration Policy

Malpractice & Maladministration Policy

Introduction

This policy relates to suspected or actual malpractice and maladministration on the part of candidates, centre staff and any others involved in providing the qualification under consideration. It is also for use by BBE staff to ensure they deal with all malpractice and maladministration investigations in a consistent manner. It sets out the steps a centre, learners or other personnel must follow when reporting suspected or actual cases of malpractice/maladministration and BBE responsibilities in dealing with such cases. It also sets out the procedural steps BBE will follow when reviewing the cases.

DEFINITIONS

BBE (BBE Training Ltd)

Document Introduction

Regulations require the centre to establish and maintain procedures for dealing with suspected or actual malpractice and/or maladministration on the part of Learners, Centre-approved staff or any others involved in providing the qualifications, and to take appropriate action to maintain the integrity of qualifications. This document fulfils that requirement.

This document:

- Defines malpractice and maladministration in the context of delivery, assessments and internal quality assurance
- Provides examples as to the types of incidents that may occur
- Sets out the rights and responsibilities of centre approved staff and Learners in relation to such matters
- Signposts to additional CMI guidance on AI misuse in the context of assessment.

Maladministration

The term maladministration relates to any activity, neglect, default or other practice by a Centre that results in the Centre staff or Learners not complying with the specified requirements for registration, delivery or certification of the qualifications. In broad terms, maladministration generally covers mistakes or poor processes where there has been no intention on the part of the person responsible to do any harm. It may involve some degree of incompetence or ineptitude or may result from carelessness or inexperience. It often occurs when there is a change of Centre staff in key roles is a key point in time when maladministration occurs and is often caused by a poor/lack of handover between Centre staff.

Maladministration

Malpractice is essentially any activity or practice which deliberately contravenes regulations and compromises the integrity of the internal or external assessment process and/or the validity of certificates. It covers any deliberate actions, neglect, default or other practice that compromises, or could compromise:

- the assessment process
- the integrity of a regulated qualification
- the validity of a result or certificate
- the reputation and credibility of BBE
- the qualification or the wider qualifications community.

Malpractice may include a range of issues from the failure to maintain appropriate records or systems to the deliberate falsification of records in order to claim certificates. For the purpose of this policy this term also covers misconduct and forms of unnecessary discrimination or bias towards certain, or groups of, learners.



Malpractice & Maladministration Policy



Examples of Maladministration

Examples of maladministration may include the Centre staff (noting that the list is not exhaustive or prescriptive):

- Not submitting Learner work to awarding body for marking or moderation within a reasonable and practical timescale of that work being submitted by the Learner to the Centre (and, where relevant, marked and internally quality assured);
- For **Approved EPP Centres using Awarding Body Moderation Service**, this must be within 1-3 months of the Centre's assessment and internal quality assurance process being undertaken.
- For **Registered and Approved EPP Centres using Awarding Body External Marking Service** this must be within 1-3 months of receiving the Learner's completed assessment.
- For **HE Dual Accredited Centres using Awarding Body Moderation Service**, this must be within 1-3 months of the Centres assessment and internal quality assurance process
- In addition, this Learner work must be submitted for marking or moderation within 2 months before the qualification certification end date. These dates can be found within each of the qualification syllabus handbooks.
- Taking fees from individuals but not registering those individuals with Awarding Body within 6 weeks (when the reasonable expectation and understanding of the individual was that this was to happen);
- Providing incorrect or inaccurate information to Learners regarding the qualifications, progress within a qualification or similar;
- Incorrectly claiming a unit of a qualification or qualification for a Learner when a Learner has not yet

BBE Training, Citrus Group House, Diamond Way, Nene Park, Irthlingborough, Northamptonshire, NN9 5QF



info@bbetraining.co.uk



03332 07 66 33

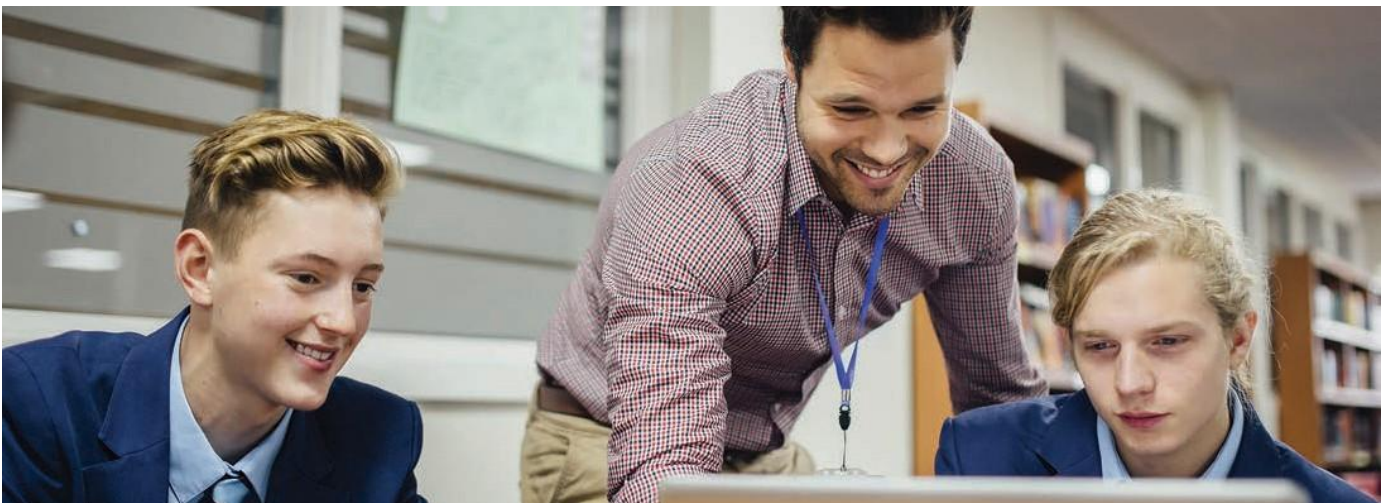


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Malpractice & Maladministration Policy

completed that unit or qualification;

- Avoidable delay; in reporting actual or potential issues or concerns to Awarding Body for example, suspected malpractice;
- Inadvertent failure to take action when actual or potential issues or concerns have been identified;
- Mistakes arising from inattention or inaction;
- Faulty or out-of-update procedures within the approved Centre;
- Failure to follow correct procedures, this includes both Awarding Body and Centre procedures;
- Poor record keeping (including management, Learner tracking, assessment and quality assurance records);
- Poor communication with Internal Centre Staff, Learner, Employer and/or Awarding Body;
- Inadvertently giving misleading or inadequate information to Awarding Body;
- Advertising qualifications for which the Centre is not approved or obsolete qualifications;
- Taking fees for Reasonable Adjustments;
- Demanding fees be paid for the release of a qualification certificate that has been completed;
- Failing to investigate a suspected malpractice when required to do so.
- Promoting fake reviews of a CMI qualification on the centre's own website or via a third-party website.



Malpractice & Maladministration Policy

Examples of Malpractice by Centres

Examples of approved Centre malpractice could include: (noting that the list is not exhaustive or prescriptive):

- The insecure storage of assessment instruments and marking guidance;
- Misuse of assessments, including inappropriate adjustments to assessment decisions;
- Failure to comply with requirements for accurate and safe retention of Learner evidence, assessment and internal quality assurance records;
- Failure to comply with Awarding Body procedures for managing and transferring accurate Learner data;
- Knowingly presenting a Learner's work for assessment or moderation when it is not the work of that individual;
- Deliberate falsification of records in order to claim certificates;
- Deliberate falsification of records or misuse of data to gain Centre approval;
- Presenting CVs of uncontracted staff during the Centre approval application process or approved Centres requesting new members of uncontracted Centre staff for approval, once approved as an approved Centre.

The above would normally be attributable to the failure of systems and processes operated by the Centre, rather than the fault of individuals.

CMI Centre Staff Malpractice

This means malpractice committed by a current (or former) member of staff (or contractor) at an approved Centre. It can arise through, for example:

- A breach of security (for example, failure to keep material secure, tampering with coursework etc.);
- Excessive direction from Delivery Staff, Assessors to Learners (for example; prompting Learners in assessments by means of signs or verbal or written prompts); Malpractice and Maladministration Policy and Procedure.
- A breach of confidentiality (for example; failure to maintain confidentiality of assessment materials or personal data);
- Deception (for example; manufacturing evidence of competence, fabricating assessment or internal quality assurance records);
- The provision of improper assistance to Learners (for example, permitting the use of a reasonable adjustment over and above the extent permitted by centre policy);
- Provision of inaccurate or misleading information by Centre staff about qualifications;
- Failure to adhere to regulations/stated requirements.

Examples of Malpractice by Learners

Malpractice by a Learner in internal assessment could occur in:

- Portfolios of internal assessment evidence;
- Presentation of practical work;
- Preparation and authentication of coursework;
- Conduct during an internal assessment;
- Conduct during an external assessment;
- Submission of an assignment generated in part or fully through misuse of AI

Please note that Awarding Body considers the misuse of AI to be a combination of plagiarism and collusion.



Malpractice & Maladministration Policy

Examples of Learner malpractice could include

- Plagiarism - failure to acknowledge sources properly and/or the submission of another person's work as if it were the Learner's own; for example, the misuse of Artificial Intelligence (AI)
- Collusion with others, when an assessment must be completed by individual Learners and/or evidence, must relate to that individual Learner; for example, the misuse of Artificial Intelligence (AI)
- Copying from another Learner (including using ICT to do so);
- Impersonation - assuming the identity of another Learner or a Learner asking another person to assume their identity during an assessment;
- Inclusion of inappropriate, offensive, discriminatory or obscene material in assessment evidence. This includes vulgarity and swearing that is outside of the context of the assessment, or any material of a discriminatory nature (including racism, sexism and homophobia);
- Inappropriate behaviour during an internal assessment that causes disruption to others. This includes shouting and/or aggressive behaviour or language and having an unauthorised electronic device that causes a disturbance in the examination room;
- Frivolous content - producing content that is unrelated to the question in scripts or coursework;
- The procurement of evidence from a third party (for example; Artificial Intelligence (AI), essay mill, ghostwriting) which is submitted and declared as the Learner's own work.

Please note that reasonable adjustment, without having been formally approved prior to submission by the Awarding Body, will not be accepted as a defence for misuse of AI.

Irrespective of the underlying cause or the people involved, all allegations of suspected or actual malpractice in relation to delivery and assessment need to be investigated in order to protect the integrity of the Awarding Body qualification and to be fair to the CMI Centre and all Learners.



Malpractice & Maladministration Policy

Preventing and Dealing with Malpractice and Maladministration

Roles and Responsibilities

Awarding Body is responsible for:

Taking all reasonable steps to **identify** the risk of any incidents, malpractice or maladministration which could have an 'Adverse Effect' ;

Adverse Effect - 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

the Malpractice and Maladministration Policy and Procedure 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.

- Taking all reasonable steps to **prevent** (or mitigate) any incidents, malpractice or maladministration which could have an 'Adverse Effect';
- Provide appropriate training and/or information to approved Centres on ways of working and arrangements to prevent malpractice and maladministration;
- Ensuring it has written up-to-date procedures in place for the investigation of suspected or alleged malpractice and/or maladministration;
- Carrying out or overseeing investigations of cases (or suspected cases) of malpractice and/or maladministration to establish whether it has occurred;
- Promptly taking all reasonable steps to prevent (or mitigate) any adverse effects arising from the malpractice and/or maladministration;
- Keeping under review the arrangements put in place by approved Centres for preventing and investigating malpractice and maladministration;
- Providing guidance to approved Centres (upon request) as to how best to prevent, investigate, and deal with malpractice and maladministration;
- Taking steps to prevent any malpractice or maladministration from recurring;
- Taking appropriate and proportionate action against those who are responsible for the malpractice and/or maladministration;
- Applying appropriate sanctions in line with its published sanctions policy;
- Informing approved Centres and other Awarding Bodies of the malpractice and/or maladministration, as appropriate;



Malpractice & Maladministration Policy

- Notifying regulators when it has caused to believe that an event has occurred, or is likely to occur, which could have an Adverse Effect;
- Reporting the matter to the police, where there is a credible allegation of suspected malpractice and/or maladministration that could constitute criminal activity (especially where the malpractice has led to fraud);
- Designing qualifications and processes to reduce, as far as reasonably possible, the opportunity for malpractice and maladministration to occur..

Centre/Approved Staff Responsibility

Immediately notifying Awarding Body of any incidents, or suspected incidents, of malpractice and/or maladministration as required by the Awarding Body policies;

- Complying with published awarding body malpractice procedures;
- Taking reasonable steps to prevent malpractice/ maladministration from arising;
- Advising Learners of the Awarding Body policy on malpractice/maladministration during their induction;
- Being vigilant to possible instances of malpractice and maladministration;
- Assisting with any Awarding Body requests for information;
- Co-operating with Awarding Body malpractice/maladministration investigations;
- Carrying out investigations of malpractice under the guidance of Awarding Body;
- Implementing any actions required during and after the investigation into a case of malpractice;
- Taking action is required to prevent the recurrence of malpractice/maladministration.

Where Approved Centres are Awarding Bodies in their own right, for example, universities, the Awarding Body only require them to notify us at the conclusion of their internal processes and not at the suspicion stage. Independent of the university sanction against the Learner, the Awarding Body will then decide whether an adverse effect has occurred and take steps against the Learner/Centre to maintain the integrity of the qualification

Reporting Suspected Malpractice or Maladministration

Examiners, moderators and verifiers, members of centre staff or learners who suspect malpractice must report this immediately to BBE in writing setting out a full account of the incident together with any supporting evidence.

All allegations must include (where possible):

- centre's name, address and number
- learner's name and BBE registration number
- centre/BBE personnel's details (name, job role) if they are involved in the case
- details of the BBE course/qualification affected or nature of the service affected
- nature of the suspected or actual malpractice and associated dates
- details and outcome of any initial investigation carried out by the centre or anybody else involved in the case, including any mitigating circumstances.

If a centre has conducted an initial investigation prior to formally notifying BBE the centre should ensure that staff involved in the initial investigation are competent and have no personal interest in the outcome of the investigation. Such investigations would normally involve the head of centre (if there is an investigation into allegations of malpractice or irregularities against the head of the centre or the management of the centre then such investigations should be carried out by the Chair of the Governing Body of the centre or his/her nominee). However, it is important to note that in all instances the centre must immediately notify BBE if they suspect malpractice or maladministration has occurred as we have a responsibility to the regulatory authorities to ensure that all investigations are carried out rigorously and effectively.



Malpractice & Maladministration Policy

In all cases of suspected malpractice and maladministration reported to BBE we will protect the identity of the 'informant' in accordance with our duty of confidentiality and/or any other legal duty.

In the event of a breach of this policy for CMI learners follow these steps.

The CMI Centre discovers suspected or alleged malpractice and/or maladministration

All CMI Centres are required to adhere to set CMI policies and procedures in the management, delivery, assessment and awarding of CMI qualifications. Centre staff should be fully aware of their Centre's own procedures for preventing and dealing with malpractice and maladministration.

They should also be aware that they must report any suspected or alleged cases to CMI immediately. All cases must be reported to awardingbody@managers.org.uk with the email subject line as - *Suspected or Alleged Malpractice and Maladministration*.

The following information must be contained within the body of the email -

- Centre Name;
- Centre Point of Contact including name and email address;
- Name of the staff and/or Learner(s) involved in the suspected or alleged case of malpractice and maladministration;
- A summary of the suspected or alleged case of malpractice and maladministration;
- A summary of the actions taken so far, whether an investigation has started and the likely outcome date.
- Alternatively, Centres may wish to complete the Centre Report of Suspected Malpractice Form and attach this document to the email.

Step 1 - CMI's Awarding Body Support Team (ABST) will acknowledge receipt of the email within 3 working (UK) days of receiving the email and will record the details on its internal incident log and inform the allocated CMI Quality Manager of these actions.

Step 2 - On receipt of any report of suspected or alleged malpractice or maladministration at a Centre, the CMI ABST will apply an immediate Level 3 sanction in line with its Sanctions Policy to stop Learner registrations and certifications, where appropriate. This action is taken to prevent any possibility of an Adverse Effect and will remain in place until the outcome of the investigation is known or unless directed by the Senior Quality Managers.

Step 3 - CMI will review the initial summary of the information provided by the Centre in the email/completed form and then the allocated Centre's CMI Quality Manager will decide whether the Centre is to undertake an initial investigation or whether CMI will directly undertake the investigation. The Centre's CMI Quality Manager will then liaise with the CMI Relationship Manager and inform the Centre's Point of Contact and/or the Centre's Programme Director of the next steps in the investigation process.

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Malpractice & Maladministration Policy

As part of the investigation process, guidance will be given to Centres on how to investigate and deal with any cases of suspected or alleged malpractice or maladministration. If the matter involves plagiarism, collusion or misuse of AI misuse, CMI can provide viva guidance. This can be requested from awardingbody@managers.org.uk. Vivas need to be conducted within 10 working days of the suspected malpractice for best effectiveness.

Step 4 - Where a Centre is directed to undertake an initial investigation, they will be required to **fully** complete the Centre Report of Suspected Malpractice Form and send to CMI, enclosing any supporting evidence within **10 working (UK) days** of the request email from the CMI Quality Manager.

Failure to report any such suspected or alleged issues, or fully investigate the case may result in further sanctions being applied in line with CMI's Sanctions Policy.

CMI discover suspected or alleged malpractice and/or maladministration

Where internal CMI Moderators and/or CMI Markers suspect cases of malpractice and/or maladministration they should report their suspicions immediately to their CMI Lead Moderator and the Centre's allocated CMI Quality Manager. The Lead Moderator and CMI Quality Manager will then decide whether an investigation is required.

Where an investigation is required, the CMI Quality Manager will email the ABST - awarding@managers.org.uk and steps 1 - 4 (As above) will be followed.

Where internal CMI Lead Moderators and/or CMI Quality Managers suspect cases of malpractice and/or maladministration they should report their suspicions to the Senior Quality Manager. Where an investigation is required, the CMI Quality Manager will email the ABST - awarding@managers.org.uk and steps 1 - 4 (As above) will be followed.

Confidentiality and Whistleblowing

Sometimes a person making an allegation of malpractice or maladministration may wish to remain anonymous. However it is preferable for those individuals to reveal their identity and contact details to BBE and then to request BBE not to divulge their identity if concerned about possible adverse consequences. While BBE are prepared to investigate issues which are reported anonymously, we will always try to confirm an allegation by means of a separate investigation before taking up the matter with those to whom the allegation relates. Requests for anonymity will be respected by BBE except where this is not possible for legal reasons.

Information by telephone must be followed by a written statement before it can be used in any investigation. BBE will consider each disclosure of information sensitively and carefully, and decide upon an appropriate response. Although BBE aim to keep the identity of whistle blowers confidential, this cannot be guaranteed if their identity is required by another agency, for example:

- the police, fraud prevention agencies or other law enforcement agencies (to investigate or prevent crime, including fraud)
- the courts (in connection with court proceedings) another person to whom we are required by law to disclose your identity
- other third parties where we consider it necessary to do so (e.g. the regulator Ofqual)

A whistle blower should also recognize that they may be identifiable to others due to the nature or circumstances of the disclosure.

BBE aims to keep informants updated as to the progression of the allegation, but will not disclose details of ongoing investigations. In addition, it may not be appropriate to disclose full details of the outcomes of the investigation due to confidentiality or legal reasons (eg disclose full details on the action that may be taken against the parties concerned).

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Malpractice & Maladministration Policy

Responsibility For The Investigation

In accordance with regulatory requirements, all suspected cases of maladministration and malpractice will be examined promptly by BBE to establish if malpractice or maladministration has occurred. All reasonable steps will be taken to prevent any adverse effect from occurring as defined by the regulator Ofqual.

All suspected cases of malpractice and maladministration will be passed to our Quality Assurance Senior Manager (QASM) and BBE will acknowledge receipt, as appropriate, to external parties within 48 hours.

The QASM will be responsible for ensuring the investigation is carried out in a prompt and effective manner and in accordance with the procedures in this policy. A relevant member of staff (e.g. an EV) will be allocated to lead the investigation and establish whether or not the malpractice or maladministration has occurred and review any supporting evidence received or gathered by BBE.

At all times we will ensure that BBE personnel assigned to the investigation have the appropriate level of training and competence and they have had no previous involvement or personal interest in the matter.



Responsibility For The Investigation

The evidence will be considered by the QASM. Should they have a personal knowledge or interest in the case then nominees will be established to deal with the particular investigation. At this stage the following are confirmed:

- correct procedures have been followed
- the information supplied by the centre is comprehensive – further information is requested if appropriate
- individuals involved have been given the opportunity to present a written statement
- the facts are established where there is conflicting information
- whether BBE assessment regulations have been broken and who is responsible for the breach
- proposed measures to be taken to protect the integrity of the assessment and prevent future instances
- the nature of the proposed penalty to be applied.

The proposed measures and penalties are recommended to the Executive for its formal approval.

Notifying Relevant Parties

In all cases of suspected, or actual, malpractice the Head of the Centre involved in the allegation will be informed (except when the head of the centre or management is under investigation; in which case communication will be with the Chair of Governors, Local Authority officials or other appropriate authorities) that BBE will be investigating the matter. In the case of learner malpractice, the centre may be asked to investigate the issue in liaison with BBE personnel – in doing so we may withhold details of the person making the allegation if to do so would breach a duty of confidentiality or any other legal duty.

BBE may communicate directly with former members of centre staff who have been accused of malpractice, if appropriate (eg the staff member is no longer employed by the centre) and/or communicate directly with a learner or their representative (eg if there is a contradiction in the evidence provided during an investigation or where the centre is suspected of being involved in malpractice).

Where applicable, the Responsible Officer, or QASM on behalf of the Responsible Officer will inform the appropriate regulatory authorities if we believe there has been an incident of malpractice or maladministration.

Where the allegation may affect another awarding organisation and their provision we will also inform them in accordance with the regulatory requirements and obligations imposed on BBE by the regulator Ofqual. If we do not know the details of organisations that might be affected we will ask Ofqual to help us identify relevant parties that should be informed. If fraud is suspected and/or identified we may also notify the police.



Malpractice & Maladministration Policy

Responsibility For The Investigation

We aim to action and resolve all stages of the investigation within 28 working days of receipt of the allegation. Please note that in some cases the investigation may take longer; for example, if a centre visit is required. In such instances, we will advise all parties concerned of the likely revised timescale.

The fundamental principle of all investigations is to conduct them in a fair, reasonable and legal manner, ensuring that all relevant evidence is considered without bias. In doing so, investigations will be based around the following broad objectives:

- to establish the facts relating to allegations/complaints in order to determine whether any irregularities have occurred
- to identify the cause of the irregularities and those involved
- to establish the scale of the irregularities
- to evaluate any action already taken by the centre
- to determine whether remedial action is required to reduce the risk to current registered learners and to preserve the integrity of the qualification
- to ascertain whether any action is required in respect of certificates already issued
- to obtain clear evidence to support any sanctions to be applied to the centre, and/or to members of staff, in accordance with our Sanctions Policy
- to identify any adverse patterns or trends.

BBE may request further information from relevant parties and/or interviews with personnel involved in the investigation. Therefore, we will:

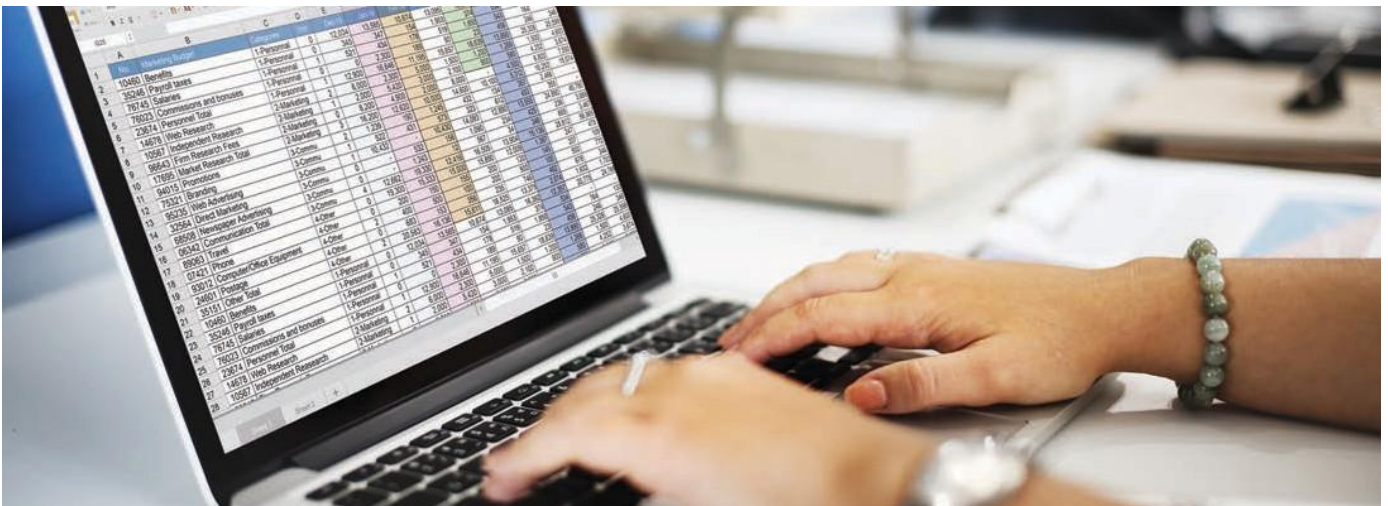
- ensure all material collected as part of an investigation is kept secure. All records and original documentation concerning a completed investigation that ultimately leads to sanctions against a centre will be retained for a period of no less than five years. If an investigation leads to invalidation of certificates, or criminal or civil prosecution, all records and original documentation relating to the case will be retained until the case and any appeals have been heard and for five years thereafter
- expect all parties, who are either directly or indirectly involved in the investigation, to fully co-operate with us.

Either at notification of a suspected or actual case of malpractice or maladministration and/or at any time during the investigation, we reserve the right to impose sanctions on the centre in accordance with our Sanctions Policy, in order to protect the interests of learners and the integrity of the qualifications.

BBE also reserve the right to withhold a learner's, and/or cohort's, results for all the course/ qualifications and/or units they are studying at the time of the notification or investigation of suspected or actual malpractice/maladministration. If we find that the complexity of a case, or a lack of cooperation from a centre, means that BBE are unable to complete an investigation, we will consult the relevant regulatory authority in order to determine how best to progress the matter.

Where a member of BBE staff is under investigation we may suspend them or move them to other duties until the investigation is complete.

Throughout the investigation the QASM will be responsible for overseeing the work of the investigation team to ensure that due process is being followed, appropriate evidence has been gathered and reviewed and for liaising with and keeping informed relevant external parties.



Malpractice & Maladministration Policy

Investigation Report

If we believe there is sufficient evidence to implicate an individual/centre in malpractice/ and/or maladministration we will:

- inform them (preferably in writing) of the allegation
- provided them with details of the evidence we found to support our judgment
- inform them of the possible consequences
- inform them that information in relation to the allegation and investigation may be, or has been, shared with the regulators and other relevant bodies (eg police)
- provided them with an opportunity to consider and respond to the allegation and our findings
- inform them of our appeals policy should they wish to appeal against our decision.

After an investigation, we will produce a draft report for the parties concerned to check the factual accuracy. Any subsequent amendments will be agreed between the parties concerned and ourselves. The report will:

- identify where the breach, if any, occurred
- confirm the facts of the case (and any mitigating factors if relevant)
- identify who is responsible for the breach (if any)
- contain supporting evidence where appropriate (eg written statements)
- confirm an appropriate level of remedial action to be applied.

We will make the final report available to the parties concerned and to the regulatory authorities and other external agencies as required.

If it was an independent/third party who notified us of the suspected or actual case of malpractice, we will also inform them of the outcome – normally within 5 working days of making our decision. In doing so we may withhold some details, if to disclose such information would breach a duty of confidentiality or any other legal duty.

If it is an internal investigation against a member of our staff the report will be agreed by the QASM with the relevant internal managers and appropriate internal disciplinary procedures will be implemented.



Malpractice & Maladministration Policy

Investigation Outcomes

If the investigation confirms that malpractice or maladministration has taken place we will consider the action to take to:

- minimise the risk to the integrity of certification now and in the future
- maintain public confidence in the delivery and awarding of qualifications
- discourage others from carrying out similar instances of malpractice or maladministration
- ensure there has been no gain from compromising our standards.

The actions BBE may take include (this list is indicative only and is not meant to form an exhaustive list):

- Impose actions in relation to the centre with specified deadlines in order to address the instance of malpractice/maladministration and to prevent it from reoccurring such as:
 - undertaking additional visits to the centre to provide them with a greater level of support and/or monitoring depending on their needs and performance
 - requiring specific centre staff to undergo additional training and/or scrutiny by the centre if there are concerns about their ability to undertake their role in the delivery of BBE qualifications effectively
 - not permitting specific centre staff to be involved in the delivery or assessment of BBE qualifications (e.g. not permitting an individual to invigilate BBE examinations or assessments altering the way, and the period in which, centres receive examination/assessment materials from BBE if there are concerns around their ability to maintain the security and confidentiality of such materials.)
 - appointing independent invigilators to observe an exam at the centre if there are concerns around the centre's arrangements and/or the centre is unable to resource particular exams.
- Impose sanctions on the centre – if so, these will be communicated to the centre in accordance with our sanctions policy along with the rationale for the sanction(s) selected
- Take action against learners in relation to proven instances of cheating, plagiarism and fraud, such as directly and/or via the centre taking one or all of the following:
 - issuing a written warning that if the offence is repeated further action may be taken
 - loss of all marks/credits for the related work/unit
 - disqualification from the unit(s)/qualification
 - placing a ban for a set period of time from taking any further qualifications with us.
- In cases where certificates are deemed to be invalid, inform the centre concerned and the regulatory authorities why they are invalid and any action to be taken for reassessment and/or for the withdrawal of the certificates. We will also ask the centre to let the affected learners know the action we are taking and that their original certificates are invalid. We will ask the centre – where possible – to return the invalid certificates to BBE. We will also amend our database so that duplicates of the invalid certificates cannot be issued and we expect the centre to amend their records to show that the original awards are invalid
- Amend aspects of our qualification development, delivery and awarding arrangements and, if required, assessment and/or monitoring arrangements and associated guidance to prevent the issue from reoccurring
- Inform relevant third parties (eg funding bodies) of our findings in case they need to take relevant action in relation to the centre.

In proven cases of malpractice and/or maladministration by a centre, BBE reserves the right to charge the centre for any resits and reissuing of certificates and/or additional EV visits. The fees for this will be the current BBE prices for such activities at the time of the investigation.

In addition, to the above the QASM will record any lessons learnt from the investigation and pass these onto relevant internal colleagues to help BBE prevent the same instance of maladministration or malpractice from reoccurring.

If the relevant party (ies) wishes to appeal against our decision to impose sanctions, please refer to our Appeals Policy.

Last review: June 2026

Next review: June 2027

