

## **Sanctions Policy**

### **Introduction**

This policy applies to all centres delivering Crossfields Institute qualifications and programmes who have failed to meet aspects of our delivery requirements or standards laid down by the regulatory authorities in respect of regulated qualifications and units. It sets out the sanctions Crossfields Institute may impose on centres in such situations.

It is also for use by our staff to ensure they apply any sanctions in a consistent manner.

### **Centre's responsibility**

It is important that all staff involved in the delivery of our qualifications and programmes are fully aware of the contents of the policy and the possible implications for the centre should the centre fail to comply with requirements specified by Crossfields Institute in relation to the delivery of qualifications.

### **Ensuring the standards of our qualifications and programmes**

Crossfields Institute has a responsibility to the learners taking our qualifications and programmes and the UK regulatory authorities to ensure that centres deliver in accordance with relevant national standards.

### **Approach to sanctions**

Crossfields Institute has a range of sanctions that can be imposed on a centre depending on the seriousness of the situation, the level and track-record of the centre's non-compliance and the risk to the interests of learners and the integrity of the qualifications/programmes.

If sanctions are required then they will be applied depending on the nature of the situation. For example if the centre has<sup>1</sup>:

- Outstanding actions
- Poor records to confirm assessment decisions
- Proven collusion or persistent bad marking of centre-marked assessments
- Suspected or proven cases of maladministration/malpractice at the centre /or the services provided by the centre and/or its satellite sites or third parties
- Made certification claims before learners have completed the unit(s)/qualification(s)

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<sup>1</sup> The examples for recommending and imposing sanctions in this section and below are only indicative and are not meant to form an exhaustive list.

- A increased likelihood of an adverse effect occurring (ie something that is likely to have an adverse effect on the standards of the qualifications they are delivering or public confidence in qualifications)
- Refused access to premises and/or records to the staff of Crossfields Institute or the regulatory authorities
- Breached any requirement contained in the centre approval or qualification approval application submitted by the centre and accepted by Crossfields Institute
- Repeatedly breached requirements contained in the centre approval or qualification approval application submitted by the centre and accepted by Crossfields Institute in such a manner as to reasonably justify doubts about its ability or intention to deliver our qualifications and services in accordance with the terms of outlined in the application(s)

It is important to note that the following are not classified as sanctions, but standard good awarding organisation practice:

- When a centre is first recognised and approved by us to offer one of our qualifications, or if they have subsequently applied and been approved to offer another qualification in a sector or qualification type that is significantly different from previous qualifications they offer, we will approve the centre to offer the qualification(s) and not process any certificate claims for the qualification(s) until the centre has received a satisfactory external quality assurance visit. This approach is generally seen as good practice amongst awarding organisations and is intended to help ensure the centre is delivering this 'new' qualification effectively before certificates can be issued.
- Should a centre refuse to pay outstanding fees after various contact with our Finance Office, then we may remove centre or qualification approval with immediate effect. Such a decision would not be considered a sanction but a commercial decision.
- We may undertake additional visits to a centre to provide them with a greater level of support and/or monitoring depending on their needs and performance or to follow-up on actions resulting from a malpractice or maladministration investigation.
- We may require 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 our qualifications and programmes effectively. Such decisions would normally be communicated to the centre via an 'action' following a centre review visit. It is important to note that we reserve the right to impose a number of restrictions against individuals at any time. Ordinarily, restrictions would be imposed against individuals either during or prior to conducting an investigation into maladministration or malpractice connected to a Centre with whom the individual(s) is/are connected. Restrictions against individuals may include not permitting specific staff to be involved in the delivery/assessment of our qualifications for a specified period of time.

- We may appoint our staff to observe an assessment at the centre if there are concerns around the centre's arrangements and/or the centre is unable to resource particular assessments. Such actions will be discussed with the centre during or after a centre engagement visit.
- We may carry out unannounced visits to centres in the interests of ensuring centre staff are delivering and assessing correctly and maintaining our quality standards.

### **Sanctions that may be imposed**

Sanctions that may be imposed as part of a centre approval/qualification approval decision, monitoring activity or investigation into a complaint, appeal or allegation of malpractice and/or maladministration include:

- **withholding certificates** (eg suspending certification status) and/or
- **preventing further learner registrations by the centre** (eg suspending registration status)

For either:

- A single qualification
- An entire qualification type
- All qualifications

Crossfields Institute takes a reasonable and pragmatic approach to the application of sanctions ensuring that all centres are treated fairly. Recommendations in relation to the above types of sanctions will be reviewed by the Responsible Officer, and if there is clear evidence of non-compliance by the centre and/or a sufficient rationale then the sanction will be imposed on the centre.

In all instances the nature of the sanction and the rationale for its application will be communicated in writing to the centre via a letter from the Responsible Officer.

If a centre disagrees with the decision the first point of call is the relevant External Quality Assurer (EQA), then the Responsible Officer and then Crossfields Institute's Appeals arrangements.

Only in exceptional circumstances of extremely serious non-compliance or the persistent failure of the centre to address outstanding actions, and/or the failure of previous sanctions to address the issue, would Crossfields Institute impose the ultimate sanction of **removal of qualification approval** in relation to:

- A single qualification
- An entire qualification type

- All qualifications and in turn the centre's 'recognition' with Crossfields Institute

Crossfields Institute expects that it would never impose the immediate withdrawal of approval for a qualification or range of qualifications without:

- the centre being given an opportunity to address the area(s) of non-compliance
- first imposing one of the previous types of sanctions
- there being evidence that the non-compliance poses a significant threat to the interest of learners or the integrity of the qualifications and programmes

Should a centre have its approval for a qualification removed, the Head of Quality will take all reasonable steps to protect the interests of any learners currently registered on the qualification(s). For example, we will either certificate them for any achievements achieved to date and/or seek to transfer them – where possible and feasible – to another centre to enable them to carry on with their learning.

### **Sanctions that may be imposed on learners**

Should a learner, or group of learners, be found to have committed Malpractice then the following sanctions may be imposed on them in accordance with the arrangements outlined in our Malpractice and Maladministration policy (which may be communicated to the learner by Crossfields Institute and/or the learner's centre):

- 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 from taking any further qualifications with us (may be for a set period of time)

### **Ensuring consistency in our approach**

The length of time any of the above sanctions will be imposed will depend on the situation that warranted their introduction.

The Responsible Officer will be responsible for regularly reviewing the application and maintenance of sanctions to ensure they continue to be appropriate, consistent and proportionate to the incident(s) and risk of future incidents occurring.

### **Review arrangements**

We will review this document annually as part of our self-evaluation arrangements. However, a review will be commissioned earlier should an issue arise in relation to our sanction arrangements and/or in response to customer, learner or regulatory feedback.

## **Contact us**

If you have any queries about the contents of the policy, please contact the Responsible Officer by email at [lou.doliczny@crossfieldsinstitute.com](mailto:lou.doliczny@crossfieldsinstitute.com) or write to:

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**Reviewed by: Alison Richards**