

CMI Centre Sanction Policy – Ref: AB/POL/0012/Jan20/V07
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Purpose

To ensure that consistent standards are being maintained and that CMI and the relevant Regulatory Bodies' quality and monitoring requirements are being met, and that Quality Managers/Auditor implement CMI's quality assurance measures in CMI Centres. This policy aims to:

- Minimise the risk to the integrity of CMI qualifications, both now and in the future
- Ensure that only those Learners who have reached the required standard are awarded the qualification
- Maintain the confidence of the public in the delivery and awarding of qualifications

Introduction

If CMI finds that a CMI Centre is not maintaining the standards required, CMI will provide support and feedback and assist in a process of continuous improvement. These action points will be recorded on the Centre Visit Report Action Plan and, depending on the level of the non-compliance, and the risk level, a sanction will be applied.

The Quality Manager/Auditor and the CMI Centre will agree a date by when the actions should be implemented and this date will be recorded on the Centre Visit Report Action Plan.

Any corrective action should be implemented within a maximum of 3 months of the Centre Visit Report Action Plan being issued, or further actions and/or sanctions of a higher nature will be issued.

In accordance with CMI Moderation Rules, CMI can at any time impose a 100% moderation requirement against a Centre. This can be in conjunction with any of the below sanctions.

In the case of suspected Malpractice or Maladministration, CMI will impose sanction levels of Level 3 or above until a full investigation has been conducted. Please refer to CMI Malpractice and Maladministration Policy and Procedures for further information.

Where a Centre has been sanctioned multiple times at levels 2 or 3 within a year period, and the Centre is considered to be without the capacity to make the necessary improvements, CMI reserves the right to move immediately to sanction level 5 - Centre withdrawal.

Centre visit requirements

All Centres will be visited by CMI at a frequency and mode determined by the Centre risk defined by the awarding body. This may be face-to-face or virtual, and the format and frequency will be decided by the relevant Quality Manager based on a risk assessment of the Centre.

Centres which fail to confirm reasonable requests for Centre visits, or which cancel a pre-arranged Centre visit at short notice and/or without suitable explanation and alternative date/time provided to the relevant Quality Manager may have a sanction applied.

Reasons that may be considered by CMI as 'exceptional circumstances' for which a Centre visit can be rearranged without penalty or sanction include (but are not limited to) the following:

- Illness of the Centre Programme Director, or requirement to attend a medical appointment, or accident or emergency involving the Programme Director
- Medical or other emergency of a spouse or dependent of the Centre Programme Director
- Business-critical appointment which cannot be moved or changed e.g. bid/tender meeting.

Please inform CMI immediately when you are aware of any situation which may prevent a Centre Quality Assurance visit. In every case, the Programme Director must establish that there is no suitable alternative deputy who can attend the visit and must ensure that the Quality Manager has been informed of their absence. This must be done verbally or by email in which case confirmation of receipt should be sought. New visit dates must be agreed within two weeks of cancellation.

Cancellation of two consecutive pre-arranged and confirmed Centre visits, no matter what the circumstances, may lead to a sanction being applied.

In all cases, please seek advice from your Quality Manager. Reasonable requests to rearrange Centre visits with appropriate notice will always be considered.

Scope

This policy applies to all CMI approved and registered Centres.

Sanction Levels

Risk Level	Sanction	Maximum Allowable Timeframe
0	Good practice points suggested	Next Visit
Level 1	Action Plan - Action points to be completed by agreed deadline	3 Months
Level 2	Suspension of Registration - Action points to be completed by agreed deadline	3 Months
Level 3	Suspension of Registration and Certification - Action points to be completed by agreed deadline	3 Months
Level 4	Removal of approval for specific qualification(s) - Action points to be completed by agreed deadline	3 Months
Level 5	Withdrawal of Centre Approval. The regulator will be informed	Immediate
Level 6	Centre Dormancy	See notes below

In order to carry out the necessary monitoring and evaluation, CMI will:

- A) Plan Centre Visits that focus on quality and probity in the work of CMI Centres.

- B) Plan unannounced Centre Visits that focus on quality and probity in the work of CMI Centres.
- C) Monitor and audit by desk top exercises.
- D) Conduct investigations that focus on issues or allegations that have been brought to CMI's attention from whistleblowers, third parties or incidents that have lead to suspicions of Malpractice and Maladministration.
- E) Employ (or commission) and train Quality Managers/Auditor, Lead Moderators, Moderators and Markers who have appropriate expertise to undertake monitoring and evaluation of work. These individuals will follow the procedures laid down by CMI and adhere to the Approval Criteria and Centre Partnership Agreement.
- F) Make fair and objective judgments on whether CMI Centres have in place governance, administration and quality assurance systems that meet the requirements of the approval criteria and that assessment arrangements are consistent, rigorous and lead to awards at the appropriate standard of achievement.
- G) Inform CMI Centres of the outcomes of monitoring and evaluation activity and set conditions of approval where they are not complying with the approval criteria and Centre Partnership Agreement.
- H) Require CMI Centres to rectify the non-compliance within a specified period of time and monitor its successful completion.
- I) Impose sanctions where they are needed, to ensure CMI Centres comply with the relevant criteria, Centre Partnership Agreement and to protect the interests of Learners.
- J) Use the outcomes of monitoring and subsequent action taken by CMI Centres to inform them of decisions on the delivery of qualifications, or if necessary, the withdrawal of CMI Approval.

Dormancy

A dormant Centre is defined as one that has paid its annual Centre fee but

- One that does not register any Learners within 12 months of becoming approved
OR
- One that has had registrations and completions but then has no registered Learners for a period of 6 months
OR
- One that has notified CMI that it is to make no registrations within the next few months.

In all the above cases, a Level 6 sanction will be placed and the Centre transferred to the Awarding Body Quality Auditor (QA).

In order to return to Approved status, the following actions will be taken:

- A request will be received by CMI from the Centre to go live. This will be logged with the QA
- The QA will check with the Senior Quality Manager (SQM) in order to assign a Quality Manager (QM)
- If the Centre has been dormant for longer than 12 months, the SQM or QA will ask for a credit check to be instigated by the Finance Team

- The result of the credit check will be notified to the SQM who will decide whether the dormant status can be lifted. If the credit check causes concern, the Relationship Manager will be instructed to contact the Centre to inform them that due to an adverse credit check their request has been refused.
- The Centre will be notified of CMI's Appeals Policy.
- If the SQM decides that the dormant status can be lifted, they will notify the allocated QM.
- The QM will conduct a Centre visit (which may be virtual). This will review any actions from the previous Centre visit and ensure that there are sufficient staff and resources in place to run the planned qualifications. Further actions may be applied.
- When the QM is satisfied, they will notify the QA to lift the Level 6 sanction.
- If the QM is not satisfied, they will inform the Centre that a Sanction 6 will remain and explain the reasons for this. Service and the RM will be informed.

END

Tariff of sanctions for non-compliance

Indicative Non-compliance Issue	Sanction	Rationale
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<p>1.1 Centre's aims, policies and assessment practices, and responsibilities of staff are not clear or well understood by the assessment team</p> <p>1.2 Internal verification procedures and activities not clearly documented</p> <p>1.3 Insufficient or ineffective feedback processes to Learners</p> <p>1.4 Communication within the assessment team and with the Awarding Body is ineffective</p> <p>1.5 Equipment and accommodation do not comply with relevant health and safety legislation</p> <p>1.6 Insufficiently qualified Assessors</p> <p>1.7 Assessors/Internal Verifiers do not have adequate development plans – they are not able to demonstrate CPD</p> <p>1.8 Learners are not aware of their rights and responsibilities e.g. no appeals procedure for Learners or Centre suggests we see Learners every time</p> <p>1.9 There is inadequate assessment planning with Learners</p> <p>1.10 Changes to personnel are not notified to the Awarding Body i.e. Programme Director, Assessor or Internal Verifier</p> <p>1.11 Unit only certification or awarding a smaller size qualification is not made available to Learners</p> <p>1.12 There is inadequate or ineffective monitoring or review of procedures</p> <p>1.13 Inaccurate or insufficient information is provided on the Hub</p> <p>1.14 Policies/processes are not compliant with CMI regulations - need amending</p> <p>1.15 Any other reason considered by the Quality Manager</p>	<p>Level 1 - Action Plan - Action points to be completed by agreed deadline</p>	<p>Non-compliance with Centre Approval Criteria but no threat to the integrity of CMI qualifications</p> <p>This section appears to be about communication with CMI and Learner support</p>
<p>2</p> <p>2.1 Assessment process disadvantages Learners</p> <p>2.2 Unacceptable level of referral of Learner work</p> <p>2.3 Continual referral of batches due to administrative errors</p> <p>2.4 Assessment brief does not meet assessment criteria</p> <p>2.5 Centre fails to provide access to requested records, information, Learners, and staff</p> <p>2.6 Records of assessment show serious anomalies</p> <p>2.7 Previously agreed corrective measures relating to Level 1 are not implemented</p> <p>2.8 Maladministration; Learners are not registered within 6 weeks of start of programme</p>	<p>Level 2 - Suspension of Registration - Action points to be completed by agreed deadline</p>	<p>Threat to Learners</p> <p>Loss of the integrity of assessment decisions and reputation /confidence (e.g. failure to pay invoice) of CMI or qualifications framework</p>

<p>2.9 Centre does not take all reasonable steps to prevent incidents of malpractice or maladministration from occurring</p> <p>2.10 Centre records, Learner records and details of achievement are not accurate, or recorded in a timely and secure manner in line with the requirements of the Awarding Organisation and Data Protection</p> <p>2.11 Centre fails to operate a complaint handling process or appeals process for the benefit of Learners</p> <p>2.12 Large number of complaints from Learners</p> <p>2.13 Centre has CMI outstanding debt</p> <p>2.13 Centre has not signed their Centre Regulatory Agreement</p> <p>2.14 Centre continually cancels Quality Assurance visits</p> <p>2.15 Changes or failure to report/agree registered address, delivery address, corporate structure, financial stability</p> <p>2.16 Failure to report Malpractice or incident</p> <p>2.17 Failure to report third party relationship/satellite Centre</p> <p>2.18 Failure to ensure the Centre has appropriate resources in place to deliver and assess CMI qualifications to the required standard</p> <p>2.19 The Centre fails to ensure the corporate sustainability of the organization</p> <p>2.20 Any other reason considered by Quality Manager</p>		
<p>3</p> <p>3.1 Assessment process disadvantages Learners</p> <p>3.2 Assessment decisions are unfair</p> <p>3.3 Assessment does not meet assessment criteria</p> <p>3.4 The Centre fails to provide access to requested records, information, Learners and staff</p> <p>3.5 Numerous cases of unidentified plagiarism</p> <p>3.6 Assessed evidence is not the authentic work of Learners - suspected fraud</p> <p>3.7 Records of assessment show serious anomalies</p> <p>3.8 Certification claims are made before all the requirements of assessment are satisfied</p> <p>3.9 Suspected malpractice and/or maladministration</p> <p>3.10 Previously agreed corrective measures relating to level 2 are not implemented</p> <p>3.11 Major change of circumstances with Centre – lack of confidence in processes being implemented</p> <p>3.12 Pending outcome of malpractice investigation/whistleblowing/advice/receipt of</p>	<p>Level 3 - Suspension of Registration and Certification - Action points to be completed by agreed deadline</p>	<p>Threat to Learners</p> <p>Loss of the integrity of assessment decisions</p> <p>Risk of invalid claims of certification</p>

<p>information from regulators/other government bodies</p> <p>3.13 Any other reason considered by Quality Manager</p>		
<p>4</p> <p>4.1 Assessment process disadvantages Learners</p> <p>4.2 Assessment decisions are unfair</p> <p>4.3 No qualified Internal Verifier</p> <p>4.4 Assessment does not meet assessment criteria</p> <p>4.5 The Centre fails to provide access to requested records, information, Learners and staff</p> <p>4.6 Numerous cases of plagiarism</p> <p>4.7 Assessed evidence is not the authentic work of Learners</p> <p>4.8 Suspected fraud</p> <p>4.9 Records of assessment show serious anomalies</p> <p>4.10 Certification claims made before all the requirements of assessment are satisfied</p> <p>4.11 Suspected malpractice and/or maladministration</p> <p>4.12 Previously agreed corrective measures relating to Levels 1, 2 and 3 are not implemented within time frames given</p> <p>4.13 Any other reason considered by Quality Manager</p>	<p>Level 4 -</p> <p>Removal of approval for specific qualification(s) -</p> <p>Action points to be completed by agreed deadline</p>	<p>Threat to Learners</p> <p>Loss of the integrity of assessment decisions</p> <p>Risk of invalid claims of certification</p>
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