

## CMI Malpractice and Maladministration Policy and Procedure

AB/POL/0002 • April 2022 • V10.0

### History

Date	Amendments made
<b>April 2022 V10</b>	Amendments made inline with updates in Ofqual General Conditions of Recognition
<b>September 2021 V09</b>	SQA principles update
<b>August 2019 V08</b>	<ul style="list-style-type: none"> <li>• Complete revision of the policy, including incorporation of the Malpractice and Maladministration Procedure (AB/PRO/0002/Aug16/V8) and discontinuation of this procedure</li> <li>• Insertion of 'History' and 'Distribution' sections</li> <li>• Inclusion of the regulatory requirements text from Ofqual and SQA</li> <li>• Inclusion of examples of what may be considered as maladministration</li> </ul>

### Distribution

#### Distribution List

- All Quality Managers
- All Lead Moderators
- New Partner Relationship Manager
- Customer Service Team
- Assessment and Support Coordinator
- HE Partnership Support Executive
- Digital Delivery Quality Auditor
- CMI Centres
- This policy will be published on the CMI website

## Purpose

### Document Purpose

The successful delivery of CMI qualifications and their associated assessments relies on the trust, integrity and diligence of Centres, Learners, CMI and our suppliers, and the wider education community – the vast majority of whom take their responsibilities seriously. Normally the qualifications system functions well, but occasionally things go wrong. When this happens, CMI will need to investigate, and – where appropriate – take action, to maintain public confidence, secure accurate results for Learners and ensure assessments remain fit for purpose.

CMI will take all reasonable steps to prevent the occurrence of any malpractice or maladministration in the development, delivery and award of qualifications which it makes available or proposes to make available.

Where it has not been possible to prevent this, it is in everyone's interest to ensure that all cases of suspected or actual malpractice and/or maladministration are dealt with quickly, thoroughly and effectively.

## Scope

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This policy applies to all CMI Awarding Body staff (including contractors), CMI Centres and CMI-registered Learners.

## Introduction

### Document Introduction

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

#### This document:

- Defines malpractice and maladministration in the context of delivery and assessments
- Provides examples as to the types of incidents that may occur
- Sets out the rights and responsibilities of CMI, CMI approved staff and Learners in relation to such matters

## Regulatory Requirements

### Regulatory Requirements

#### Regulatory Requirements and definitions:

This policy meets the regulatory requirements set out by the Ofqual/CCEA Regulation/Qualifications Wales General Conditions of Recognition (August 2018):

## **Preventing malpractice and maladministration**

A8.1 - An awarding organisation must take all reasonable steps to prevent the occurrence of any malpractice or maladministration in the development, delivery and award of qualifications which it makes available or proposes to make available.

## **Investigating and managing the effect of malpractice and maladministration**

A8.2 - Where any such malpractice or maladministration is suspected by an awarding organisation or alleged by any other person, and where there are reasonable grounds for that suspicion or allegation, the awarding organisation must –

- (a) so far as possible, establish whether or not the malpractice or maladministration has occurred, and
- (b) promptly take all reasonable steps to prevent any Adverse Effect to which it may give rise and, where any such Adverse Effect occurs, mitigate it as far as possible and correct it.

## **Procedures relating to malpractice and maladministration**

A8.3 - For the purposes of this condition, an awarding organisation must –

- (a) establish, maintain, and at all times comply with, up to date written procedures for the investigation of suspected or alleged malpractice or maladministration, and
- (b) ensure that such investigations are carried out rigorously, effectively, and by persons of appropriate competence who have no personal interest in their outcome.

A8.4 - Where a Centre undertakes any part of the delivery of a qualification which an awarding organisation makes available, the awarding organisation must take all reasonable steps to keep under review the arrangements put in place by that Centre for preventing and investigating malpractice and maladministration.

A8.5 - An awarding organisation must, following a request from such a Centre, provide guidance to the Centre as to how best to prevent, investigate, and deal with malpractice and maladministration.

## **Dealing with malpractice and maladministration**

A8.6 Where an awarding organisation establishes that any malpractice or maladministration has occurred in the development, delivery or award of qualifications which it makes available, or proposes to make available, it must promptly take all reasonable steps to –

- (a) prevent that malpractice or maladministration from recurring, and
- (b) take action against those responsible which is proportionate to the gravity and scope of the occurrence, or seek the cooperation of third parties in taking such action.

A8.7 Where an awarding organisation has any cause to believe that an occurrence of malpractice or maladministration, or any connected occurrence –

- (a) may affect a Centre undertaking any part of the delivery of a qualification which an awarding organisation makes available, it must inform that Centre, and
- (b) may affect another awarding organisation, it must inform that awarding organisation.

This Policy also meets the requirements of the SQA Accreditation Regulatory Principles (2021):

“SQA Principle 18. The awarding body and its providers must ensure that it has safeguards to prevent and manage cases of malpractice and maladministration. The awarding body and its providers are responsible for demonstrating clearly-defined processes to deal with malpractice and maladministration. The awarding body must inform SQA Accreditation when any actual or suspected cases of malpractice and/or maladministration are identified. Where a case of malpractice and/or maladministration is identified, the awarding body and/or provider should take appropriate corrective and/or preventative action.

# Definition of Malpractice and Maladministration

## What is malpractice and maladministration?

Malpractice and maladministration are two distinct, but related, concepts.

## Maladministration

The term maladministration relates to any activity, neglect, default or other practice by a CMI Centre that results in the CMI 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.

## Types of Maladministration

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

- Not submitting Learner work to CMI for marking or moderation within a reasonable and practical timescale<sup>1</sup> of that work being submitted by the learner to the Centre (and, where relevant, marked and internally quality assured<sup>2</sup>);
- Taking fees from individuals but not registering those individuals with CMI 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 CMI qualifications, progress within a CMI qualification or similar;
- Incorrectly claiming a unit of a qualification or qualification for a Learner;
- Avoidable delay; in reporting actual or potential issues or concerns to CMI;
- 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 date procedures within the CMI Centre;
- Failure to follow correct procedures, this includes both CMI and Centre procedures;
- Poor record keeping (including management, learner, assessment and quality assurance records);
- Poor communication with Internal Centre Staff, Learner, Employer and/or CMI;
- Inadvertently giving misleading or inadequate information to CMI.

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<sup>1</sup> For **Approved EPP Centres using CMI Moderation Service** this must be within 1-3 months of the Centres assessment and internal quality assurance process being undertaken.

For **Registered and Approved EPP Centres using CMI External Marking Service** this must be within 1-3 months of receiving the Learners completed assessment.

For **HE Dual Accredited Centres using CMI Moderation Service** this must be within 1-3 months of the Centres assessment and internal quality assurance process.

<sup>2</sup> In addition this must be within 2 months before the qualification certification end date. These dates can be found within each of the qualification syllabus handbook - <https://www.managers.org.uk/education-and-learning/qualifications/>

## Malpractice

The term malpractice covers any deliberate actions, neglect, default or other practises that compromise, or could compromise:

- The assessment process;
- The integrity of a regulated qualification;
- The validity of a result or certificate;
- The reputation and credibility of CMI;
- The qualification or the wider qualifications community;
- The confidentiality of assessment materials.

Malpractice may include a range of issues from the failure to maintain appropriate assessment and internal quality assurance records or systems to the deliberate falsification of records in order to claim learner certificates or gain CMI Centre approval.

Failure by a CMI Centre to deal with suspected or actual identified issues may in itself constitute malpractice.

### Types of Malpractice

By contrast, malpractice will generally involve **some form of intent**. It may also include circumstances where an individual has been negligent or reckless as to the consequences of their actions. Malpractice could consist of a conscious decision to do anything covered in the list above. Bias, coercion or discrimination could also lead to malpractice.

Two of the clearest examples of potential malpractice are:

- cheating, or facilitating cheating, in an assessment; and
- attempting intentionally to manipulate a result so that it does not reflect the Learner's actual performance in an assessment.

The following list gives some examples of the types of incident that may occur (noting that the list is not exhaustive or prescriptive):

#### CMI Centre Malpractice

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

- 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 CMI centre approval;
- Presenting CVs of uncontracted staff during the CMI centre approval application process or CMI Centres requesting new members of uncontracted Centre staff for CMI approval, once approved as

a CMI 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 a CMI 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);
- 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 CMI policy);
- Provision of inaccurate or misleading information by Centre staff about CMI qualifications;
- Failure to adhere to regulations/CMI stated requirements.

### **Learner Malpractice**

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.

### **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;
- Collusion with others when an assessment must be completed by individual Learners and/or evidence must relate to that individual Learner;
- 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; essay mill, ghost writing) which is submitted and declared as the Learner's own work.

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 CMI qualification and to be fair to the CMI Centre and all Learners.

## Preventing and Dealing with Malpractice and Maladministration

### Roles and Responsibilities

CMI is responsible for:

- Taking all reasonable steps to **identify** the risk of any incidents, malpractice or maladministration which could have an 'Adverse Effect'<sup>3</sup>;
- Taking all reasonable steps to **prevent** any incidents, malpractice or maladministration which could have an 'Adverse Effect';
- Provide appropriate training and/or information to CMI 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 CMI Centres for preventing and investigating malpractice and maladministration;
- Providing guidance to CMI 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 CMI Centres and other Awarding Bodies of the malpractice and/or maladministration, as appropriate;

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<sup>3</sup> 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 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.

- Notifying regulators when it has cause to believe that an event has occurred, or is likely to occur, which could have an Adverse Effect<sup>4</sup>;
- 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.

CMI Centres/CMI approved staff are responsible for:

- Immediately notifying CMI of any incidents, or suspected incidents, of malpractice and/or maladministration as required by CMI policies;
- Complying with published CMI malpractice procedures;
- Taking reasonable steps to prevent malpractice/ maladministration from arising;
- Advising Learners of the CMI policy on malpractice/maladministration during their induction;
- Being vigilant to possible instances of malpractice and maladministration;
- Assisting with any CMI requests for information;
- Co-operating with CMI malpractice/maladministration investigations;
- Carrying out investigations of malpractice under the guidance of CMI;
- Implementing any actions required during and after investigation into a case of malpractice;
- Taking action required to prevent the recurrence of malpractice/maladministration.

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<sup>4</sup> Where CMI centres are Awarding Bodies in their own right, for example, universities, CMI 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, CMI 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

## CMI Centres

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

They should also be aware that they must report any suspected or alleged cases to CMI immediately. On receipt of any suspected or alleged malpractice or maladministration at a Centre, CMI 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.

Guidance will be given to Centres on how to prevent, investigate or deal with any cases of suspected or alleged malpractice or maladministration.

They should carry out an initial investigation and complete the Centre Report of Suspected Malpractice Form (this form can be found on the CMI Policies page under 'CMI Malpractice and Maladministration Policy and Procedure FORM') and be sent to CMI enclosing any supporting evidence within 5 working days of the notification.

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

## Staff or persons involved in the assessment, delivery and awarding of qualifications

Moderators, Markers, Quality Managers, Centre Staff or Learners who suspect cases of malpractice and/or maladministration should report their suspicions immediately via their CMI Quality Manager or directly to [awarding@managers.org.uk](mailto:awarding@managers.org.uk), this information will then be internally reported to CMI's Head of Awarding Body or in their absence the Senior Quality Manager. This should be followed with a full written account and any supporting evidence within 5 working days.

Alternatively, an individual may wish to disclose information relating to suspected or actual malpractice and/or maladministration confidently using **CMI's WhistleBlowing procedure**. A copy of this procedure can be found in the link below:

<https://www.managers.org.uk/education-and-learning/partners-and-centres/policies/>

## Third Parties and Confidentiality

If suspected or alleged cases of malpractice and/or maladministration are brought to CMI's attention by a third party or 'whistleblower', CMI will take the below steps to establish the facts of the alleged case.

- This will be done in writing to the third party seeking permission to use their name, to communicate the details of the allegation with the CMI Centre, and to find out whether the Centre's internal procedures have been exhausted;
- If the 'whistleblower' does not grant permission to use their name, and the allegation still merits investigation, CMI will advise the 'whistleblower' that the scope of the investigation may be impaired and that CMI will strive to preserve their anonymity in bringing the matter to the attention of the CMI Centre Programme Director.

Where suspected or alleged malpractice and/or maladministration are brought to the attention of CMI verbally (for example, by telephone) then CMI will request that the allegation is presented in writing (for example by post addressed to (Head of Awarding Body & Compliance, Chartered Management Institute, Management House, Cottingham Road, Corby, Northants, NN17 1TT) or email - [awardingbody@managers.org.uk](mailto:awardingbody@managers.org.uk). In the event that CMI receives no follow up confirmation of the allegation in writing, then CMI will keep an internal record of the allegation in line with its data protection

policy; and undertake any investigation as required.

Where suspected or alleged malpractice and/or maladministration is brought to the attention of CMI by a member of Centre staff or a Learner, CMI will consider, if relevant, how best to protect the informant during and after any investigative activity.

## Review

### CMI Review of Malpractice and/or Maladministration Cases

In a case of suspected malpractice and/or maladministration the Head of the Awarding Body and/or Senior Quality Manager will review the information presented and, if there are reasonable grounds, will decide on the most appropriate course of action. The action taken will depend on the nature and severity of the case, but could include:-

- Consideration of whether the information provided is sufficient to make a judgement;
- Requiring the CMI Centre Programme Director to carry out a more in-depth investigation and to provide a written report within a set timescale. This will be in suspected cases of lesser immediate risk or severity such as an isolated plagiarism incident;
- Implementing the CMI Investigation Procedure, for example in the case of alleged fraud or in a case of serious threat to the integrity of CMI qualification or where a Centre does not have the capacity to conduct a full investigation;
- Consider whether there is a risk of an Adverse Effect and the steps that should be taken to prevent this;
- Consider whether the Regulators should be notified of the matter;
- Consider whether further sanctions should be applied against a Centre until the investigation is complete;
- Inform the originator of the case of progress and timescales.

The review will take place as soon as possible after receipt of the information and no later than 5 working days after receipt.

### Notifying the Regulators

When CMI has cause to believe that an event has occurred, or is likely to occur, which could have an Adverse Effect it has obligation to promptly notify the regulator(s) where it has cause to believe that there has been an incident of malpractice or maladministration, which could either invalidate the award of a qualification which it makes available, or could affect another awarding organisation.

In all cases, CMI will not wait until it has the full picture before informing the regulator(s). Therefore, where CMI has cause to believe that malpractice or maladministration has, or is likely to, occur, and that this could have an Adverse Effect, it will not wait until it has completed any investigation before notifying the regulator(s). Where there is a credible allegation of suspected malpractice or maladministration that could constitute criminal activity, CMI may wish to consider whether they should notify the police as well as notifying the regulator(s).

CMI and the CMI Centre are required to co-operate in full, providing information and taking any appropriate action.

### Ofqual and Qualifications Wales

CMI will notify suspected or actual malpractice and maladministration to Ofqual and Qualifications Wales via their respective Regulation AO Portals.

## SQA Accreditation

CMI will notify suspected or actual malpractice and maladministration to SQA Accreditation;  
[regulation@sqa.org.uk](mailto:regulation@sqa.org.uk)

## CCEA Regulation

CMI will notify suspected or actual malpractice and maladministration to CCEA Regulation;  
[ccearegulation@ccea.org.uk](mailto:ccearegulation@ccea.org.uk)

## CMI Investigation

Once the CMI has established that there are reasonable grounds for the suspicion or allegation, it will ensure a rigorous and effective investigation is carried out.

The investigation will be carried out rigorously, effectively, and in line with CMI's Investigation Procedure. Where possible it will be conducted by someone who is independent of the normal day to day working relationship with the Centre and who is competent to do so, who have no personal interest in their outcome. It will be conducted to a specified timescale. The timescale will depend on the scale of the case but will be as soon as is practically possible. An investigation, a report and a decision must all be made within 28 working days of receipt of the case information.

Centre Programme Directors carrying out investigations on behalf of CMI will be expected to use the same procedure.

## Investigation Outcomes

Once the investigation (whether it be carried out by the Centre or by CMI) has been concluded the report will be considered by the Senior Quality Manager and/or Head of Awarding Body & Compliance and a decision made on any remedial or preventative actions to be taken and of any sanctions or penalties to be implemented.

If the report confirms that suspected or alleged malpractice and/or maladministration took place CMI will first consider:-

- What reasonable steps are required to prevent any Adverse Effect which may arise;
- How to minimise any risk to the integrity of the certification now and in the future;
- How to maintain public confidence in its delivery and awarding of qualifications;
- How to ensure this same incident will not re-occur.

Proportionate action will only be taken once the facts of the case have been established. CMI will therefore consider all relevant information when determining what action to take on a case-by-case basis. In all cases CMI will consider consequential effects, including the effect of the proposed action on the individual or centre, when judging which action(s) are proportional. CMI will balance the consequences for the individual or Centre against the seriousness and effects of the malpractice and/or maladministration. This does not preclude the use of sanctions.

Actions CMI may take could include:-

- If CMI discovers that a result is incorrect, we will take all reasonable steps to ensure that it revokes any certificate if the result on the certificate is false because of malpractice or maladministration. We will consider how we will contact the Learners involved to notify them of the status of their certificates and of any arrangements for re-assessment and/or certification, as well as their right of appeal.
- Specific actions within set timescales for the CMI Centre to take to address the findings of this case;
- Additional visits to CMI Centre including spot checks;

- Additional training for CMI Centre staff and/or removing specific staff from their role in delivery or assessment;
- Imposing sanctions;
- Instigating a Centre Withdrawal process;
- Taking action against Learners – for example if found guilty of plagiarism or fraud;
- Reviewing confidentiality and/or security arrangements;
- Reviewing and amending CMI systems and procedures if required;
- Expanding the original investigation to look at other CMI qualifications or Centres;
- Review, and revise where necessary, its approach to the development, delivery and award of qualifications to ensure it remains appropriate.

Outcomes on plagiarism and collusion cases are outlined within CMI's Plagiarism and Collusion Statement.

### **Appeals against Malpractice/Maladministration decisions**

If the Centre or individuals found to be guilty of malpractice and/or maladministration do not agree with the outcome, action and/or the decision made they can make an appeal against that decision.

The appeal will review the processes taken to ensure that they were applied consistently and fairly.

Please refer to the CMI Appeals Policy and Procedure for more information.

### **Maintaining Records**

All material collected during this process including the original information and any documents relating to the investigation will be kept secure on the Awarding Body Google Drive. Information will be retained for up to 5 years.

If the outcome leads to invalid certificates, criminal or civil prosecution, materials will be held until such time as the case is completed and time allowed for any appeals to take place.

### **Alerting other Awarding Bodies**

Regulations require that CMI notifies other Awarding Bodies of cases of malpractice and/or maladministration where these cases are likely to impact on the other Awarding Bodies. In dealing with cases of malpractice/maladministration CMI must pay due regard to this requirement and notify other Awarding Bodies, as appropriate. This will usually be appropriate where:

- The CMI Centre where the malpractice and/or maladministration has occurred (or is suspected) is also approved with another Awarding Body (for the same or different qualifications) and the (suspected) malpractice could potentially impact on the activities undertaken on behalf of that other Awarding Body
- The CMI Centre where the malpractice and/or maladministration has occurred (or is suspected) is also approved with another Awarding Body for the same qualifications and there is the potential for the CMI Centre to move their operations to the other Awarding Body in an attempt to avoid sanctions and continue sub-standard practises
- The CMI Centre where the malpractice and/or maladministration has occurred (or is suspected) has indicated that they are seeking approval with another Awarding Body (for the same or different qualifications)

## Monitoring and Review

Progress of all cases of suspected malpractice or maladministration will be monitored by the Quality Managers, Senior Quality Manager and Head of Awarding Body & Compliance at the monthly meetings. Reports on progress will be provided to the Regulation Compliance Committee (RCC) for review.

All cases using this policy will be reviewed annually to ensure the appropriateness and approach is fit for purpose.