

History

Date	Amendments made
November 2023	Amendments were made to the format of the document, and changes of wording in all sections. Inclusion of Learner sanctions.

Distribution

- All Quality Managers
- Partner Relationship Managers
- Customer Service Team
- Partner Engagement Managers
- Awarding Body Support Team
- CMI Centres

Purpose

To ensure that consistent standards are being maintained 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

Centres and learners should familiarise themselves with the contents of this policy and the implications should there be a failure to comply with CMI's requirements.

Scope

This policy applies to all CMI Approved and Registered Centres.

Introduction

This policy outlines the sanctions that we may impose on CMI Centres/Learners who fail to meet our requirements. It provides examples of circumstances and situations that may lead to a sanction and indicates the level of sanction that could be imposed by the CMI. This is not an exhaustive list, and CMI will review each case on an individual basis.

If the CMI finds that a CMI Centre is not maintaining the standards required, the 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 may be applied. CMI has a range of sanctions that can be imposed on a Centre and Learners depending on the seriousness of the situation, the level of non-compliance, the risk to the interests of learners and the integrity of the assessment and qualification(s).

When a sanction is applied, we will communicate with the CMI Centre / Learner providing an explanation of the type of sanction that has been applied or will be applied and the reason why.

The CMI Quality Manager/Auditor and the CMI Centre will agree on a date by which any action(s) 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 sanctions listed in Appendix 1 of this policy.

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.

Centres/Learners have the right to appeal against a sanction that we impose and information on how to do this can be found in our published [Appeals Policy](#).

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 appointments which cannot be moved or changed for example, bid/tender meetings.

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 upon 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.

Sanction Levels Applied to Centres

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

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

- Plan Centre Visits that focus on quality and probity in the work of CMI Centres.
- Monitor and audit by desktop exercises.
- Conduct investigations that focus on issues or allegations that have been brought to CMI's attention from whistleblowers, third parties or incidents that have led to suspicions of Malpractice and Maladministration. In some cases, it may be necessary to impose a sanction on a Centre or a learner to

protect the integrity of a qualification involved in an allegation of malpractice or maladministration. This action would be taken to enable us to investigate the allegation.

- 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 Regulatory Agreement.
- 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, and rigorous and lead to awards at the appropriate standard of achievement.
- 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 Regulatory Agreement.
- Require CMI Centres to rectify the non-compliance within a specified period of time and monitor its successful completion.
- Impose sanctions where they are needed, to ensure CMI Centres comply with the relevant criteria, Centre Regulatory Agreement and to protect the interests of Learners.
- 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.

Centre Dormancy

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

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

In all the above cases, a Level 6 sanction may 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. Partner Services, the Engagement and the Relationship Managers will be informed.

Sanctions Relating to Learners

Although learner malpractice may be typically dealt with by a Centre within the assessment and Internal Quality Assurance processes, CMI may have cause to impose a sanction on an individual learner directly in line with our [Malpractice and Maladministration Policy](#).

This may occur where External Quality Assurance activities have discovered anomalies in the assessment evidence which are proven to be attributable to an individual learner.

The table in Appendix 2 outlines the sanction that may be applied, the reason for it and the consequences/actions we may take. The list of sanctions is not exhaustive, and each case will be reviewed and dealt with on an individual basis.

Monitoring and Review

CMI will review this statement annually as part of our self-evaluation arrangements and revise it in line with any feedback from stakeholders, regulatory authorities or external agencies, or changes in our practices.

Appendix 1 - Tariff of Centre Sanctions for Non-Compliance

Indicative Non-compliance Issue	Sanction Options	Rationale
<p>Sanction Level 1</p> <ul style="list-style-type: none"> ● Centre's aims, policies and assessment practices, and responsibilities of staff are not clear or well understood by Centre staff ● Internal Quality Assurance procedures and activities are not clearly documented ● Insufficient or ineffective feedback processes for Learners ● Communication within the Centre and with CMI is ineffective ● Equipment and accommodation do not comply with relevant health and safety legislation ● Insufficiently qualified Assessment Staff ● Insufficiently qualified Internal Quality Assurance Staff ● Centre fails to inform CMI of a conflict of interest and/or personal interest ● Assessors/Internal Quality Assurance staff do not have adequate development plans and/or they are not able to demonstrate CPD ● Learners are not aware of their rights and responsibilities, for example, no appeals procedure for Learners ● There is inadequate assessment planning with Learners ● The Centre has no named Programme Director (PD) ● Changes to personnel are not notified to CMI, for example, Programme Director, Deliverer, Assessor or Internal Quality Assurance staff ● Certification or awarding a smaller size qualification is not made available to Learners ● There is inadequate or ineffective monitoring or review of internal procedures and policies ● Inaccurate or insufficient information is provided to CMI ● Policies/processes are not compliant with CMI requirements or need amending ● The range of delivery and/or assessment methods is insufficient to encourage fair access ● Failure to respond to at least 3 attempts over at least 3 weeks to make contact to arrange a quality assurance activity ● Any other reason considered by the Quality Manager/Senior Quality Manager 	<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 the awarding of CMI qualifications.</p>
<p>Sanction Level 2</p> <ul style="list-style-type: none"> ● Previously agreed corrective measures relating to Level 1 sanction are not implemented ● Centre Staff do not have insufficient time, resources, or authority to perform their role 	<p>Level 2 - Suspension of Registration - Action points to be</p>	<p>Threat to Learners Loss of the integrity of assessment decisions and</p>

<ul style="list-style-type: none"> ● The assessment process disadvantages Learners ● Unacceptable level of referral of Learner work ● Continual referral of moderation/markings batches due to administrative errors ● Centre fails to provide access to requested records, information, Learners, and staff ● Records of assessment and internal quality assurance show serious anomalies ● Maladministration; Learners are not registered within 6 weeks of start of programme ● Centre does not take all reasonable steps to prevent incidents of malpractice or maladministration from occurring ● 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 CMI and Data Protection Regulation ● Centre fails to operate a complaint handling process or appeals process for the benefit of Learners ● Large number of complaints from Learners ● Centre has CMI outstanding debt > 3 Months ● Centre has not signed their Centre Regulatory Agreement ● Cancellation of two consecutive pre-arranged and confirmed Centre visits or failure to respond to a fourth attempt to make contact to arrange a quality assurance activity ● Changes or failure to report/agree registered address, delivery address, corporate structure, financial stability ● Failure to report Malpractice or Incidents ● Failure to report third party relationship/satellite or multisite Centres ● Failure to ensure the Centre has appropriate resources in place to deliver and/or assess CMI qualifications to the required standard ● The Centre fails to ensure the corporate sustainability of the organisation ● Any other reason considered by Quality Manager/Senior Quality Manager 	<p>completed by agreed deadline</p> <p>Additional External Quality Assurance / Compliance visit (At a cost to the Centre)</p> <p>Review / revalidation of Centre devised flexible assessments (At cost to the Centre)</p>	<p>reputation/confidence of CMI or qualifications framework (for example, failure to pay invoice, possibly of further accrued debt)</p>
<p>Sanction Level 3</p> <ul style="list-style-type: none"> ● Previously agreed corrective measures relating to level 1 and 2 sanctions are not implemented ● Assessment process disadvantages Learners ● Assessment decisions are unfair ● Assessment does not meet assessment criteria ● The Centre fails to provide access to requested records, information, Learners and Staff ● Numerous cases of plagiarism ● Assessed evidence is not the authentic work of Learners - suspected fraud ● Records of assessment show serious anomalies ● Certification claims are made before all the requirements of assessment are satisfied 	<p>Level 3 - Suspension of Registration and Certification - Action points to be completed by agreed deadline</p> <p>Suspension of Marking Services</p>	<p>Threat to Learners</p> <p>Loss of the integrity of assessment decisions</p> <p>Risk of invalid claims of certification</p>

<ul style="list-style-type: none"> ● Suspected malpractice and/or maladministration ● Major change of circumstances with Centre – lack of confidence in processes being implemented ● Pending outcome of incident/malpractice investigation/whistleblowing/advice/receipt of information from regulators/other government bodies ● Any other reason considered by Quality Manager/Senior Quality Manager 	<p>Suspension of Moderation Services</p> <p>Transferring from CMI Approved Centre status to CMI Registered Centre status</p>	
<p>Sanction Level 4</p> <ul style="list-style-type: none"> ● Previously agreed corrective measures relating to levels 1, 2 and 3 sanctions are not implemented within time frames given ● Significant faults in the management and quality assurance of qualification programmes ● Irretrievable breakdown in management and quality assurance of specific qualifications ● Assessment process serious disadvantages Learners ● Assessment decisions are significantly unfair and/or biased ● The Centre no longer has the competence to deliver, assess or IQA qualification(s) ● No qualified Internal Quality Assurance Staff ● Permanent loss of integrity of assessments ● The Centre fails to provide access to requested records, information, Learners and staff ● Numerous cases of plagiarism within a 12-24 month period ● Assessed evidence is not the authentic work of Learners ● Suspected fraud ● Persistent failure to comply with actions / respond to communications ● Records of assessment and internal quality assurance show serious anomalies ● Certification claims made before all the requirements of assessment are satisfied ● Suspected serious malpractice and/or maladministration ● Any other reason considered by Quality Manager/Senior Quality Manager 	<p>Level 4 -</p> <p>Removal of approval for specific qualification - Action points to be completed by agreed deadline</p> <p>Removal of Satellite Centres</p>	<p>Threat to Learners</p> <p>Loss of the integrity of assessment decisions</p> <p>Risk of invalid claims of certification</p>

<p>Sanction Level 5</p> <ul style="list-style-type: none"> • Previously agreed corrective measures relating to Levels 1, 2, 3 and 4 sanctions are not implemented within time frames given • Irretrievable breakdown in management and quality • Total breakdown in communications with Centre • Significant faults in the management and quality assurance of all qualification programmes • Persistent failure to pay for service / respond to outstanding debts requests • Numerous cases of proven plagiarism • Proven fraud • Any other reason considered by the Quality Manager/Senior Quality Manager where CMI does not feel that the Centre has the capacity to improve 	<p>Level 5 - Withdrawal of Centre Approval</p> <p>The regulator informed</p> <p>Inform other Awarding Organisations</p> <p>Inform any other Stakeholders</p>	<p>Threat to Learners</p> <p>Loss of the integrity of assessment decisions</p> <p>Risk of invalid claims of certification</p>
<p>Sanction Level 6</p> <ul style="list-style-type: none"> • Does not register any Learners within 12 months of becoming approved • Has had registrations and completions but then has no registered Learners for a period of at least 12 months • Notified CMI that it is to make no registrations within the next 12 months. 	<p>Level 6 - Suspension of Registration and Certification</p>	

Appendix 2 - Tariff of Learner Sanctions for Non-Compliance

Indicative Non-compliance Issue	Sanction Options
<p>Under the broad classification of Malpractice -</p> <ul style="list-style-type: none"> ● Plagiarism of any nature, including misuse of Artificial Intelligence (AI) and buying in assignments from a third party such as an essay mill. ● Collusion ● Falsification or fabrication of assessment evidence ● Any form of impersonation ● Any form of cheating to gain an advantage 	<ul style="list-style-type: none"> ● Action Plan ● Disallowing all or part of a learner's grade for a specific assessment ● Barring a learner from registering on a CMI qualification at any CMI Centre for a set period of time ● Permanently barring a learner from registering on a CMI qualification at any CMI Centre ● Temporary and/or permanent disqualification/removal from a CMI qualification(s) ● Barring a learner from registering as a CMI member for a set period of time ● Permanently barring a learner from registering as a CMI member ● Removing current CMI membership