

# **CMI Awarding Body**

CMI Sanctions Policy and Procedure - V9

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AB/POL/0012 - January 2026 - V9

## History

Date	Amendments Made
January 2026 - V9	<ul style="list-style-type: none"><li>• Full review of the policy and procedure</li><li>• Incorporate into the new policy template</li><li>• Include any reference to CMI Partner Connect</li><li>• Inclusion of Recognised Programmes</li><li>• Change in name for SQA Accreditation to Qualifications Scotland Accreditation</li></ul>
November 2023 - V8	<ul style="list-style-type: none"><li>• Amendments were made to the format of the document, and changes of wording were made in all sections. Inclusion of Learner Sanctions</li></ul>

## Intended Audience

- CMI Quality Managers
- CMI Partner Support Team
- CMI Partner Relationship Managers
- CMI Partner Engagement Managers
- CMI Awarding Body Support Team
- CMI Centres (Approved, Registered and Recognised)

All of CMI's policies are published on the [CMI Policies Webpage](#)

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## Purpose

The purpose of this policy is 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/Auditors implement CMI's quality assurance measures in CMI Centres. This policy aims to:

- Maintain high standards across all CMI Centres. (Regulated qualification provision and non-regulated provision, i.e. courses which are mapped to CMI's Professional Standards).
- Identify and address areas of non-compliance (including misrepresentation of provision), providing clear and transparent guidance on when sanctions may be applied and the resulting implications for Centres and Learners.
- Ensure a fair, proportionate, and consistent approach to managing non-compliance, fostering trust and accountability.
- Protect Learners, maintain public confidence, and safeguard the value of CMI qualifications and CMI's reputation.

All fully approved, registered and recognised Centres, along with their Learners, should familiarise themselves with the contents of this policy, the [CMI Quality Assurance Handbook](#) and [CMI Centre Handbook](#), to ensure a full understanding of their responsibilities and the potential consequences of non-compliance.

## Scope

This policy applies to all CMI Approved, Registered and Recognised Centres, including staff, assessors and any third parties acting on their behalf.

## Regulatory Requirements

This policy meets the regulatory requirements set out by our regulators: Ofqual, the CCEA, Qualification Wales, and Qualifications Scotland Accreditation.

[Ofqual - General Conditions of Recognition](#)

[Qualifications Wales - Standard Conditions of Recognition](#)

[CCEA Regulation - General Conditions of Recognition](#)

[Qualifications Scotland Accreditation - Regulatory Principles \(2021\)](#)

Regulator or Relevant Regulatory Body	Reference Details	Legislation/Regulatory Reference
Ofqual	General Conditions of Recognition	Condition No: C2. Arrangements with Centres Condition No: B5 Representation regarding qualification (B5.1 and B5.2)
Qualifications Wales	Standard Conditions of Recognition	Condition No: C2. Arrangements with Centres Condition No: B5 Representation regarding qualification (B5.1 and B5.2)
CCEA Regulation	General Conditions of Recognition	Condition No: C2. Arrangements with Centres Condition No: B5 Representation regarding qualification (B5.1 and B5.2)
Qualifications Scotland Accreditation	Regulatory Principles 2021	Principle 13. The Awarding body and its providers must ensure that they have systems and processes which ensure the effective quality assurance of accredited qualifications.

## Introduction

This policy outlines the potential sanctions that we may impose on CMI Centres/Learners who do not meet our requirements. It includes examples of situations that could result in a sanction and outlines the levels of sanction that could be imposed by CMI depending on the severity and risk. Please note that the examples provided are not an exhaustive list, and CMI will review each case on an individual basis.

CMI is subject to regulation as an organisation and is monitored across several key areas, including governance, change of control safeguards, conflicts of interest, resource adequacy, risk identification and management, incident handling, malpractice and maladministration and its arrangements with its Centres. Centres are required to provide CMI and the regulatory authorities full access to relevant premises (including any associated Satellite Centres), personnel, and records as required, and fully cooperate with their monitoring activities.

If CMI finds that a Centre is not meeting the required standards, CMI will provide support and feedback to promote continuous improvement. Identified actions will be recorded on the Quality Assurance Monitoring Activity Report and associated action plan. Depending on the severity of non-compliance and the associated risk, a sanction may be imposed.

CMI has a range of sanctions that can be imposed on a Centre and/or Learners based on the seriousness of the situation, the extent of non-compliance, the risk to the interests of Learners and the integrity of the assessment(s) and qualification(s).

Where non-compliance or misrepresentation is identified at a Recognised Centre, the issue will be escalated to the Senior Quality Manager/Head of Quality. The situation will be assessed with support provided and decisions made to determine whether a sanction is required to be applied.

When a sanction is applied, CMI will notify 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 will set a deadline date for the required corrective action(s) to be completed, which will be recorded and communicated through CMI Partner Connect.

All corrective actions must be completed within a maximum of three months from the date of notification. Failure to do so may result in additional actions and/or the imposition of a higher level sanction.

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

## Sanction Levels Applied to Centres

Risk Level	Sanction	Maximum Allowable Time Frame
Level 0	Improvement points suggested	Next CMI Quality Assurance Activity
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 <b>Note:</b> Suspension of registration for the Centre - all qualifications <b>or</b> Suspension of registration on a qualification/selected qualifications	3 Months
Level 3	Suspension of Registration and Certification - Action points to be completed by an agreed deadline	3 Months
Level 4	Withdrawal of Centre Approval. The regulator may be informed	Immediate

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## Sanctions relating to Centres

CMI is committed to working with Centres to prevent situations from arising that would warrant a sanction being imposed. This is achieved by carrying out a risk assessment of each Centre and the management of any identified risks through the creation of appropriate action plans. The Quality Manager/Auditor will determine whether a Centre needs extra assistance to help the Centre achieve and maintain compliance.

The Quality Manager/Auditor will identify the action(s) required by the Centre to prevent any situation arising which would merit imposing a Level 1 (or above) sanction being applied to the Centre. If the Centre fails to complete the action(s) within the required timeframe or the Quality Manager/Auditor identifies further issues that would threaten the integrity of CMI qualifications or its reputation, this could result in a higher-level sanction being imposed.

For Recognised Centres, the Senior Quality Manager or Head of Quality will identify the action(s) required by the Centre to prevent any situation arising that would merit a Level 1 (or above) sanction being applied to the Centre. If the Centre fails to complete the action(s) within the required timeframe or the Senior Quality Manager/Head of Quality identifies further issues that would threaten the integrity of the non-regulated CMI provision or CMI's reputation, this could result in a higher-level sanction being imposed.

If a Centre has previously rectified non-compliance issues in response to action plans but displays the same non-compliance issues again at a later date, this will be taken into account when considering whether to apply a higher sanction or increase the risk rating of the Centre in line with CMI Centre Assessment Standards Scrutiny (CASS) strategy.

All CMI Centres must sign and comply with the CMI Regulatory Agreement. This Agreement sets out the arrangements CMI has with its Centres to comply with the regulators' conditions and principles as a whole and to monitor, and (where necessary) take action to ensure the Centre does not put the Awarding Organisation's compliance at risk.

If CMI finds that a Centre is not maintaining the standards required or not adhering to the requirements laid out in the Regulatory Agreement and/or associated policies and procedures required to deliver CMI qualifications, then CMI has the right to undertake action. In the first instance, CMI will provide support and feedback and assist in the process of continuous improvement via the use of Action Points. These Action Points will be recorded through CMI's Partner Connect Portal via the relevant form and/or the Centre Quality Assurance Activity Report, and have a timeframe for Centre action closure. Depending on the level of non-compliance (and the risk level), a sanction will be applied (and reviewed following the closure of the action point). Failure to progress/close the action point within the timeframe may result in further actions and/or sanctions of a higher nature being issued.

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In the case of suspected Malpractice or Maladministration, CMI will impose sanction levels of Level 3 until a full investigation has been conducted. Please refer to the CMI Malpractice and Maladministration Policy and Procedure for further information, which can be accessed on the [CMI Policies Page](#). Where a Centre has been sanctioned multiple times at levels 2 or 3 within a 12-month 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 4 - withdrawal of Centre approval.

### **Qualification Sanctions**

In accordance with [CMI's Quality Assurance Handbook](#), when assigning a qualification approval risk status, CMI can impose a 100% moderation requirement by qualification at any time, and reserves the right to apply a sanction specific to a qualification. This can be applied in conjunction with any of the sanctions set out within this policy.

## **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, which can be accessed on the [CMI Policies Page](#).

This may occur where 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 sanctions that may be applied, the reasons for them 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**

This policy will be reviewed in line with CMI's Document Control Policy.

## Appendix 1 - Tariff of Centre Sanctions for Non-Compliance for Fully Approved, Registered and Recognised Centres

Indicative Non-compliance Issue	Sanction Options	Maximum Allowable Timeframe	Rationale
<p><b>Sanction Level 1</b></p> <ul style="list-style-type: none"> <li>• The Centres' policies or assessment practices are not clear or well understood by Centre staff</li> <li>• A risk-based approach to Internal Quality Assurance procedures and activities are not clearly planned or documented</li> <li>• Insufficient or ineffective feedback processes for Learners/ employers in relation to the Centres qualification provision</li> <li>• Communication within the Centre and/ or with CMI is ineffective</li> <li>• Equipment and accommodation do not comply with relevant health and safety legislation</li> <li>• Centre fails to inform CMI of a conflict of interest</li> <li>• Delivery staff /Assessors/Internal Quality Assurance staff are not able to demonstrate CPD in the vocational subject area(s)</li> <li>• Learners are not aware of their rights and responsibilities, for example, in relation to: appeals /complaints/ reasonable adjustments and special considerations / privacy</li> <li>• There is inadequate evidence of planned delivery/ assessment by the Centre for qualification provision</li> <li>• The Centre has no named Programme Director (PD)</li> <li>• Changes to personnel are not notified to CMI, for example, Programme Director/ Delivery staff / Assessors or Internal Quality Assurance staff</li> <li>• The Centre is ineffective in managing their registered Learners on qualifications whilst they are active in their registration period (Eg : movement of Learner to a withdrawn status/</li> </ul>	<p><b>Level 1</b> - This may be a Recommendation or Action Plan - with points to be completed by agreed deadline</p>	<p>Next CMI Quality Assurance Activity Meeting</p>	<p>Non-compliance with the</p> <p><b>Approved or Registered Centres:</b> Regulatory Agreement</p> <p><i>But no threat to the integrity of the awarding of CMI qualifications</i></p> <p><b>Recognised Centres:</b> Partnership Agreement/ Programme Renewal</p>

<p>transferring to a smaller size qualification (eg : Certificate or Award, or allowing Learners to become lapsed)</p> <ul style="list-style-type: none"> <li>• There is inadequate or ineffective monitoring or review of internal procedures and policies OR the Centres internal policies and processes are not compliant with CMIs requirements</li> <li>• Inaccurate or insufficient information is provided to CMI</li> <li>• Failure to respond to at least 3 attempts to make contact to arrange a quality assurance activity - sanction to remain in place until the quality assurance monitoring activity has taken place</li> <li>• Any other reason considered valid by the Quality Manager/Senior Quality Manager</li> </ul>			
<p><b>Sanction Level 2</b></p> <ul style="list-style-type: none"> <li>• Previously agreed corrective measures relating to Level 1 sanctions have not been implemented within the timeframe provided</li> <li>• Centre Staff do not have sufficient time, resources, or authority to perform their role</li> <li>• Insufficiently qualified or competent delivery/ assessment / Internal Quality Assurance Staff</li> <li>• The Centre fails to plan summative assessments through the Learners programme and therefore, the assessment process disadvantages Learners</li> <li>• Unacceptable level of referral of Learner work ( highlighted through the CMI Marking Service OR the CMI Moderation service)</li> <li>• Insufficient evidence for mapped CMI learning outcomes resulting in Centre action plans and / or remapping or failure to award the CMI qualification</li> <li>• Continual referral of moderation/marketing claims due to Centre Maladministration through continued administrative errors</li> <li>• Centre fails to provide access to requested records regarding Centre information, Learners, and staff within a required timeframe</li> </ul>	<p><b>Level 2 -</b></p> <p>Suspension of Registration - Action points to be completed by agreed deadline</p> <p>Additional External Quality Assurance/ Compliance Activity</p> <p>Review/ revalidation of Centre devised assessments</p>	<p>3 months</p>	<p><b>Approved or Registered Centres:</b></p> <p>Regulatory Agreement</p> <p>Threat to Learners</p> <p>Loss of the integrity of assessment decisions and reputation/confidence of CMI or qualifications framework (for example, failure to pay invoice, possibly of further accrued debt)</p> <p><b>Recognised Centres:</b></p> <p>Partnership</p>

<ul style="list-style-type: none"> <li>● Records of assessment and internal quality assurance show serious anomalies</li> <li>● Learner assessment and internal quality assurance is not timely to Learner submission - as required by the Centre (outlined in the CMI Malpractice and Maladministration Policy)</li> <li>● Maladministration; Learners are not registered within 6 weeks of the start of the programme</li> <li>● The Centre does not take all reasonable steps to prevent incidents of Malpractice or Maladministration from occurring</li> <li>● Centre records, Learner records and details of achievement are not accurate, or not recorded in a timely and secure manner in line with the requirements of CMI and Data Protection Regulations</li> <li>● Centre fails to operate a complaints handling process or appeals process for the benefit of Learners</li> <li>● Centre has outstanding debt to CMI &gt; 3 Months</li> <li>● The Centre has not signed its Centre Regulatory Agreement</li> <li>● Cancellation of two consecutive pre-arranged and confirmed Centre visits</li> <li>● Failure to respond to a third attempt to make contact to arrange a quality assurance activity meeting</li> <li>● Failure to carry out the required pre-quality assurance activity review within the required timeframe prior to a quality assurance review meeting</li> <li>● Changes or failure to report/agree registered address, delivery address, corporate structure, changes in ownership and financial stability</li> <li>● Failure to report Satellite Centre or Subcontract Centre/Third Party relationships, or changes to the initial Centre approval to CMI</li> <li>● The Centre fails to ensure the corporate sustainability of the organisation</li> </ul>			<p>Agreement/ Programme Renewal</p>
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<ul style="list-style-type: none"> <li>• A Recognised Centre is not accurately representing its recognised provision in its advertising, which may result in misleading Learners regarding the type of learning offered.</li> <li>• A Recognised Centre does not have an in-date Partnership Agreement in place</li> <li>• A Recognised Centre does not have an in-date Programme Renewal in place</li> <li>• A Recognised Centre is misrepresenting CMI Recognised programmes</li> <li>• Any other reason considered valid by the Quality Manager/Senior Quality Manager</li> </ul>			
<p><b>Sanction Level 3</b></p> <ul style="list-style-type: none"> <li>• Previously agreed corrective measures relating to level 1 and 2 sanctions have not been implemented</li> <li>• Assessment/ IQA process operated by the Centre disadvantages Learners</li> <li>• Numerous cases of Centre Malpractice or Maladministration, CMI has investigated / the Centre has been informed to investigate ( to include Plagiarism, Collusion and Misuse of Artificial Intelligence )</li> <li>• Failure to report Malpractice, Maladministration instances or Incidents that the Centre has investigated to CMI</li> <li>• Suspected Legal Concerns</li> <li>• The Centre no longer has the competence/ qualified staff or resources to deliver, assess or IQA qualification(s)</li> <li>• A large number of complaints or appeals from Learners have been received by the Centre or to CMI</li> <li>• Assessed evidence is not the authentic work of Learners - suspected fraud</li> <li>• Records of assessment/ IQA show serious anomalies</li> <li>• Certification claims are made before all the requirements of the assessment are satisfied</li> <li>• Suspected Malpractice and/or Maladministration</li> </ul>	<p><b>Level 3 -</b></p> <ul style="list-style-type: none"> <li>Suspension of Registration and Certification - Action points to be completed by agreed deadline</li> <li>Suspension of Marking Services</li> <li>Suspension of Moderation Services</li> <li>Transferring from CMI Approved Centre status to CMI Registered Centre status</li> <li>Additional Quality Assurance / Compliance Monitoring Activity</li> </ul>	<p>3 months</p>	<p><b>Approved or Registered Centres Recognised Centres</b></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"> <li>Major change of circumstances with Centre – lack of confidence in processes being implemented (notified or unnotified)</li> <li>Pending outcome of an incident /Malpractice or Maladministration investigation/Whistleblowing incident /advice /receipt of information from regulators/other government bodies</li> <li>A Recognised Centre is misrepresenting CMI Recognised Programmes and previous action points have not been implemented within the timeframe provided</li> <li>Any other reason considered valid by the Quality Manager/Senior Quality Manager</li> </ul>	<p>Review/ revalidation of Centre devised assessments</p> <p>Removal of Satellite Centre or Subcontract Centre/Third Parties</p>		
<p><b>Sanction Level 4</b></p> <ul style="list-style-type: none"> <li>Previously agreed corrective measures relating to Levels 1, 2 and 3 sanctions have not been implemented within the time frames given</li> <li>Irretrievable breakdown in the governance, management and quality assurance of the Centre for qualifications provision</li> <li>Total breakdown in communications with the Centre</li> <li>Persistent failure to pay for services / respond to outstanding debt requests</li> <li>Numerous cases of proven Centre Malpractice or Maladministration (to include Plagiarism, Collusion and misuse of Artificial Intelligence)</li> <li>Proven fraud</li> <li>Proval Legal incidents</li> <li>Any other reason considered valid by the Quality Manager/Senior Quality Manager where CMI does not feel that the Centre has the capacity to improve</li> </ul>	<p><b>Level 4 -</b> Withdrawal of Centre Approval</p> <p>The regulator informed</p> <p>Inform other Awarding Organisations</p> <p>Inform any other Stakeholders (internal and external)</p>	<p>Immediately</p>	<p><b>Approved or Registered Centres or Recognised Centres</b></p> <p>Threat to Learners</p> <p>Loss of the integrity of assessment decisions</p> <p>Risk of invalid claims of 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"> <li>● Plagiarism of any nature, including misuse of Artificial Intelligence (AI) and buying in assignments from a third party, such as an essay mill.</li> <li>● Collusion</li> <li>● Falsification or fabrication of assessment evidence</li> <li>● Any form of impersonation</li> <li>● Any form of cheating to gain an advantage</li> </ul>	<ul style="list-style-type: none"> <li>● Action Plan</li> <li>● Disallowing all or part of a Learner's grade for a specific assessment</li> <li>● Barring a Learner from registering on a CMI qualification at any CMI Centre for a set period of time</li> <li>● Permanently barring a Learner from registering on a CMI qualification at any CMI Centre</li> <li>● Temporary and/or permanent disqualification/removal from a CMI qualification(s)</li> <li>● Barring a Learner from registering as a CMI member for a set period of time</li> <li>● Permanently barring a Learner from registering as a CMI member</li> <li>● Removing current CMI membership</li> </ul>