

CMI Awarding Body

CMI Malpractice and Maladministration Policy
and Procedure

V14

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AB/POL/0002 - January 2026 - V14

History

Date	Amendments Made
January 2026 - V14	<ul style="list-style-type: none">• Integration of CMI Partner Connect• Replaced SQA Accreditation with Qualifications Scotland Accreditation
July 2025 - V13	<ul style="list-style-type: none">• New Template• Addition of an appendix to cover processes for Recognised Programmes
September 2024 - V12	<ul style="list-style-type: none">• Complete revision of the document.
March 2024 - V11	<ul style="list-style-type: none">• Amendments made to the procedure for notifying CMI of potential Malpractice and Maladministration• Inclusion of the AI Misuse• Updated URL Links• Appendix 1 added - Flowchart of procedure
April 2022 - V10	<ul style="list-style-type: none">• Amendments made in line with updates in Ofqual General Conditions of Recognition
September 2021 - V9	<ul style="list-style-type: none">• SQA Accreditation Principles update
August 2 2019 - V8	<ul style="list-style-type: none">• Complete revision of the policy, including the incorporation of the Malpractice and Maladministration Procedure (AB/PRO/0002/Aug16/V8) and discontinuation of this procedure• Insertion of 'History' and 'Distribution' sections• Inclusion of the regulatory requirements text from Ofqual and SQA• Inclusion of examples of what may be considered as maladministration

Intended Audience

- CMI Quality Managers
- CMI Markers and Moderators
- CMI Partner Relationship Managers
- CMI Partner Engagement Managers
- CMI Awarding Body Support Team
- CMI Approved Centres
- CMI Registered Centres
- CMI Recognised Centres

Purpose

The successful delivery of CMI qualifications, CMI recognised programmes 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, ensure Learners are not disadvantaged 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, award and certification 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.

Regulations require CMI to establish and maintain procedures for dealing with suspected or actual malpractice and/or maladministration on the part of Learners, CMI Centre-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 administration, delivery, assessments and internal quality assurance.
- Provides examples of the types of incidents that may occur.
- Sets out the rights and responsibilities of CMI, staff, CMI Centres, and Learners in relation to such matters.
- Signposts to additional CMI guidance on Artificial Intelligence (AI) misuse in the context of assessment.

Scope

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

Regulatory Requirements

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

[Ofqual - Conditions of Recognition](#)

[Qualifications Wales - Regulatory Conditions](#)

[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: A8. Malpractice and maladministration.
Qualifications Wales	Standard Conditions of Recognition	Condition No: A8. Malpractice and maladministration.
CCEA Regulation	General Conditions of Recognition	Condition No: A8. Malpractice and maladministration.
Qualifications Scotland Accreditation	Regulation Principles 2021	Principle 18. The awarding body and its providers must ensure that it has safeguards to prevent and manage cases of malpractice and maladministration.

CMI considers the misuse of Artificial Intelligence (AI) to constitute a combination of plagiarism and collusion. Further guidance is available in CMI's Plagiarism, Collusion and Artificial Intelligence (AI) Statement, which is available on the [CMI Policy Page](#). This guidance aligns with the 5 key objectives (detailed below) set by Ofqual/CCEA Regulation and Qualifications Wales, which shape their regulatory approach to AI.

- Ensuring fairness for students
- Maintaining the validity of qualifications
- Protecting security
- Maintaining public confidence
- Enabling innovation

Definition of Maladministration and Malpractice

What is Maladministration and Malpractice?

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

Maladministration

The term maladministration refers to any activity, neglect, default or other practice by a CMI Centre that results in the CMI Centre staff or Learners failing to comply with the specified requirements for registration, delivery or certification of qualifications. In broad terms, maladministration generally covers errors or ineffective processes where there has been no deliberate intent to cause harm. It may arise from a lack of competence, carelessness, or inexperience. Maladministration is particularly likely to occur during periods of change in key Centre roles, most commonly as a result of inadequate or ineffective handover between members of Centre staff.

Types of Maladministration

Examples of maladministration may include (but are not limited to) the CMI Centre staff:

- Not submitting Learner work to CMI for marking or moderation within a reasonable and practical timescale of that work being submitted by the Learner to the Centre (and, where relevant, marked and internally quality assured);
 - For **Approved EPP Centres using the CMI Moderation Service**, moderation claims for a unit **must** normally be made within 1-3 months after the Centre has completed the unit assessment and internal quality assurance (IQA) processes.

As a matter of best practice, Centres should aim to complete both assessment and IQA within 2 - 3 months of Learner submission. Delays beyond this point may adversely affect the reliability and validity of assessment decisions and may disadvantage the Learner.

Any deviation from this is at the discretion of the designated CMI Quality Manager. If the deviation is not agreed in advance, proportionate actions and/or sanctions may be applied to the Centre.

- For **Registered and Approved EPP Centres using CMI External Marking Service**, this **must** normally be within 1-3 months of receiving the Learner's completed assessment. Any deviation from this is at the discretion of the designated CMI Quality Manager and may result in actions/sanctions being taken against the Centre.
- For **HE Dual-Accredited Centres using the CMI Moderation Service**, CMI moderation will normally take place within 1–3 months following completion of the Centre's examination board.

Recognising that assessment timelines are governed by Higher Education regulations and examination board schedules, Centres are expected to complete assessment and IQA in accordance with their institutional assessment regulations and approved examination board schedules.

Any deviation from this expectation is at the discretion of the designated CMI Quality Manager. If the deviation is not agreed in advance, proportionate actions and/or sanctions may be applied to the Centre.

- In addition, all Learner work **must** be submitted for marking or moderation with CMI at least 2 months before the qualification certification end date. These dates can be found within each of the [Qualification Syllabus](#) or within the [CMI Qualification List](#).
- Where fees are taken from individuals, Centres must register those Learners within 6 weeks. Failure to register within this timeframe, and/or setting the expectation that a Learner has started a specific qualification, is inconsistent with the Centre's registration obligations and the Learner's reasonable expectations.
- 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 a qualification for a Learner when a Learner has not yet completed that unit or qualification;
- Avoidable delay in reporting actual or potential issues or concerns to CMI, for example, suspected malpractice;

- 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, which includes both CMI and Centre procedures;
- Poor record keeping (including management, Learner tracking, assessment and quality assurance records);
- Poor communication with Internal Centre staff, Learner, Employer and/or CMI;
- Inadvertently giving misleading or inadequate information to CMI;
- Advertising qualifications for which the Centre is not approved or obsolete qualifications.
- Delivering and/or assessing qualifications for which the Centre does not hold approval.
- Charging Learners fees for reasonable adjustments, whether for the application process or for the application for approved adjustments. Withholding a completed qualification certificate pending payment of fees.
- Failing to investigate a suspected malpractice when required to do so.
- Promoting fake reviews of a CMI qualification on the Centre's own website or via a third-party website.

Malpractice

The term malpractice covers any deliberate actions, neglect, default, or other practices 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

Malpractice may be **intentional** or **unintentional**, including situations where an individual has acted negligently or recklessly, regardless of intent, with respect to the consequences of their actions. Malpractice may arise from a conscious decision to engage in any of the activities described within

this policy or from failures, errors, or omissions that fall below expected standards of practice. Bias, coercion or discrimination may also constitute malpractice where such behaviour compromises the integrity of assessment or certification.

The clearest examples of malpractice include, but are not limited to:

- Cheating, or facilitating cheating, in an assessment
- Plagiarism, including presenting someone else's work as your own.
- Collusion, including work with others in a way that contravenes assessment instructions.
- Intentionally attempting to manipulate assessment outcomes so that results do not reflect the Learner's actual performance.
- Intentional or unintentional misuse of artificial intelligence (AI) to complete an assessment in a manner that is contrary to the guidance provided by CMI.

The following sections provide illustrative examples of incidents that may constitute malpractice. These examples are not exhaustive or prescriptive.

CMI Centre Malpractice

Examples of CMI Centre malpractice may include, but are not limited to:

- Insecure storage of assessment instruments and associated marking guidance.
- Using Centre devised assessment methods or assessment briefs which have not been approved by CMI. Failure to comply with requirements for the accurate, secure retention of Learner evidence, assessment records, and internal quality assurance documentation.
- Failure to comply with Awarding Body procedures for the accurate management and transfer of Learner data.
- Knowingly presenting a Learner's work for assessment or moderation where that work is not the Learner's own.
- Deliberate falsification of records in order to claim certificates.
Deliberate falsification of records or misuse of data to obtain or retain CMI Centre approval.
- Misrepresenting Centre staffing by presenting CVs or requesting approval for individuals who are not contracted to the Centre, whether during or after the approval process.
- Not maintaining accurate Centre staff records, specifically by failing to remove uncontracted or former staff.
- Inadequate support for staff and Learners regarding AI use, or a failure to address action plans mandated by previous AI investigations.

Such instances of Centre malpractice would normally be attributable to failures in the systems and processes operated by the Centre, rather than the actions of individual members of staff.

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 assessment material, etc.).
- Excessive direction from Delivery staff or Assessors to Learners (for example, prompting Learners in assessments by means of signs or verbal or written prompts, if applicable).
- 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 the CMI regulatory requirements.

Learner Malpractice

Malpractice by a Learner in internal assessment could occur in the following contexts:

- Portfolios of internal assessment evidence.
- Presentation of practical work.
- Preparation and authentication of coursework.
- Conduct during an internal assessment.
- Conduct during an external assessment.

CMI considers the misuse of AI to be a combination of plagiarism and collusion.

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; for example, the misuse of Artificial Intelligence (AI).
- **Collusion** with others, including the misuse of Artificial Intelligence (AI), where assessments are required to be completed by individual Learners, and the submitted evidence must relate solely to the work of that 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).
- 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, ghostwriting), which is submitted and declared as the Learner's own work.

Please note that reasonable adjustments, without having been formally approved prior to submission by CMI, will not be accepted as a defence for misuse of AI.

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'. Please refer to the [Adverse Effect](#) section within this policy.
- Taking all reasonable steps to **prevent** (or mitigate) any incidents, malpractice or maladministration which could have an 'Adverse Effect'.
- Providing 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 of suspected 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 on the Centre/Learner in line with its published sanctions policy, which can be accessed on the [CMI Policies Page](#)
- Informing CMI Centres and other Awarding Bodies of the malpractice and/or maladministration, as appropriate.
- Notifying regulators when it has cause to believe that an event has occurred, or is likely to occur, which could have an Adverse Effect.
- 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.

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.

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 the investigation into a case of malpractice;
- Taking action to prevent the recurrence of malpractice/maladministration.

Where CMI Centres are Awarding Bodies in their own right, for example, organisations with Degree Awarding Powers, CMI only require them to notify us at the conclusion of their internal processes and not at the suspicion stage. Independent of the Centre's 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 Maladministration and Malpractice

For a visual guide to this process, please refer to the flowchart detailed within [Appendix 1](#).

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

They should also be aware that they must report any suspected or alleged cases to CMI immediately, where the Centre has concerns relating to summative assessments. All cases must be reported to CMI by completing an Enquiry Form within CMI Partner Connect. The Centre will be able to select the option for **Reporting Malpractice and/or Maladministration**. The form will capture the details of the case, and the Centre must provide as much information as possible.

The following information must be contained within the **CMI Partner Connect Enquiry Form**:

- Name of the staff and/or Learner(s) involved in the suspected or alleged case of malpractice and maladministration.
- A summary of the suspected or alleged case of malpractice and maladministration.
- A summary of the actions taken so far, whether an investigation has started and the likely outcome date.

Step 1 - CMI's Partner Services Team (PST) will acknowledge receipt of the Enquiry Form within 3 working (UK) days of receiving the form and forward it to the CMI Awarding Body Support Team (ABST), which will record the details on its internal incident log and inform the allocated CMI Quality Manager of these actions.

Step 2 - On receipt of any report of suspected or alleged malpractice or maladministration at a Centre, the CMI ABST will apply an immediate Level 3 sanction in line with CMI Sanctions Policy, which can be accessed on [CMI Policies webpage](#), 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 or unless otherwise directed by the Senior Quality Manager

and/or the Head of Quality.

Step 3 - CMI will review the initial summary of the information provided by the Centre in the completed form. The Centre's allocated CMI Quality Manager will decide whether the Centre is to undertake an initial investigation or whether CMI will directly undertake the investigation.

Step 4 - Where a Centre is directed to undertake an initial investigation, they will be required to **fully** complete an **Incident Investigation Report** through CMI Partner Connect. CMI will initiate this form and send it to the Centre for completion. Any supporting evidence must be provided to CMI within **10 working (UK) days** of the request notification from the CMI Partner Connect system.

As part of the investigation process, guidance will be given to Centres on how to investigate and deal with any cases of suspected or alleged malpractice or maladministration. If the matter involves plagiarism, collusion or misuse of AI, CMI can provide viva guidance. This can be requested through the Enquiry Form on CMI Partner Connect. To ensure effectiveness, Vivas should be conducted within **10 working days** of the suspected malpractice being identified.

Failure to report any suspected or alleged issues, or to **fully investigate** the case, may result in further sanctions being applied in line with the CMI Sanction Policy, which can be accessed on the [CMI Policies Page](#).

When CMI discover suspected or alleged malpractice and/or maladministration

Where internal CMI Moderators and/or CMI Markers suspect cases of malpractice and/or maladministration, they should report their suspicions immediately to their CMI Lead Moderator and the Centre's allocated CMI Quality Manager. The Lead Moderator and CMI Quality Manager will then decide whether an investigation is required and notify the Senior Quality Manager or Head of Quality. Where an investigation is required, the CMI Quality Manager will instigate an **Incident Investigation Report** through CMI Partner Connect.

Third Parties, Whistleblowers and Confidentiality

Alternatively, an individual may wish to disclose information relating to suspected or actual malpractice and/or maladministration confidently using CMI's WhistleBlowing Procedure, which can be accessed on the [CMI Policy Page](#).

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 following 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.
- In both scenarios above, the CMI Quality Manager will instigate an Incident Investigation Report through CMI Partner Connect.

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 be presented in writing, which can be emailed to - awardingbody@managers.org.uk or by post (addressed to Awarding Body Support Team, Chartered Management Institute, 77 Kingsway, London, WC2B 65R). 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 Privacy Policy](#), and any investigations will be undertaken as required.

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

Where suspected or alleged malpractice and/or maladministration is brought to the attention of CMI by an external person or persons, CMI will treat this as a whistleblowing case and investigate accordingly. CMI will consider, if relevant, how best to protect the informant during and after any investigative activity.

Investigation

In all cases, 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, in line with the CMI's Investigation Procedure.

Where a Centre is instructed to undertake an initial investigation, this will be required to be undertaken by a suitably competent individual who is independent of the Centre's routine working relationships and has no personal interest in the investigation outcome. The Centre will conduct the investigation in accordance with the timescales set out within CMI's Investigation Procedure, which can be accessed on

CMI Review of Malpractice and/or Maladministration Cases

Following receipt of the investigation information and evidence from the Centre, CMI will complete its review, any internal reporting, and issue a final decision within **20 working (UK) days**. Where this timescale cannot be met, for example, due to case complexity, CMI will notify all relevant parties.

In a case of suspected malpractice and/or maladministration, the CMI Quality Manager and/or Senior Quality Manager will review the information and evidence 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, as well as the sufficiency of the information provided.

Potential actions may include, but are not limited to :

- Requiring the CMI Centre Programme Director to undertake a more detailed written report within a set timescale. This approach may be used in cases presenting a lower level of immediate risk or severity, such as an isolated plagiarism incident.
- Initiating the CMI Investigation Procedure, for example, where there are allegations of fraud, a case of serious risk to the integrity of a CMI qualification or where a Centre does not have the capacity to conduct a full and robust investigation;
- Considering whether there is a risk of an Adverse Effect and determining the appropriate actions required to mitigate or prevent such an effect.
- Considering whether the matter should be notified to the relevant Regulators, in line with regulatory requirements.
- Considering whether interim or further sanctions should be applied against the Centre while the investigation is ongoing.
- Keeping the originator of the allegation informed of progress, outcomes and indicative timescales, as appropriate.

Notifying the Regulators

CMI needs to establish if an event has occurred, or is likely to occur, which has/could have an Adverse Effect. If so, CMI has an obligation to promptly notify the Regulator(s) that 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.

CMI is obligated to inform Qualifications Scotland Accreditation if Qualifications Scotland Accreditation

qualifications are involved, even before it is established whether an adverse effect is likely. All suspected malpractice and maladministration will be notified to Qualifications Scotland Accreditation by CMI.

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 occurred, 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 will consider whether to notify the police as well as notifying the Regulator(s).

CMI and the CMI Centre are required to cooperate in full, providing information and taking any appropriate action. The following Regulators are those that will need to be notified of cases within their jurisdictions -

- **Ofqual and CCEA Regulation** - CMI will notify of suspected or actual malpractice and/or maladministration to Ofqual and CCEA Regulation via their respective Regulation AO Portals.
- **Qualifications Wales** - CMI will notify suspected or actual malpractice and/or maladministration to Qualifications Wales: incidents@qualifications.wales
- **Qualifications Scotland Accreditation** - CMI will notify suspected or actual malpractice and/or maladministration to Qualifications Scotland Accreditation; regulation@sqa.org.uk

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 Centre's allocated CMI Quality Manager and the Senior Quality Manager(s) and/or the Head or Quality and/or Head of Awarding Organisation 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?
- If an Adverse Effect has occurred, what steps are required to mitigate any impact?
- How to minimise any risk to the integrity of the certification now and in the future.
- How to maintain public confidence in the 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, but are not limited to:

- **Revoking Certificates:** If a result is found to be false due to malpractice or maladministration, **Mandating specific remedial actions** for the CMI Centre to address findings within set timescales. **Conducting additional visits** to the CMI Centre, including unannounced spot checks.
- **Requiring additional training** for CMI Centre staff and/or removing specific staff from their role in delivery or assessment.
- **Imposing sanctions** on the Centre/qualifications/Learners
- **Initiating the Centre Withdrawal process** to remove approval.
- **Taking disciplinary action against Learners** – **particularly in cases of confirmed cases** of plagiarism, fraud, collusion or AI misuse.
- **Reviewing and strengthening** confidentiality and/or security arrangements.
- **Reviewing and amending** CMI systems, procedures and guidance to prevent recurrence. **Expanding the investigation** to examine other CMI qualifications or Centres.
- **Revising the approach** to the development, delivery and award of qualifications to ensure they remain appropriate.
- **Reviewing CMI Policies, Procedures and Guidance**

CMI will decide at this stage of the procedure whether to remove the Level 3 sanction previously applied in line with its **Sanctions Policy**, which can be accessed from the [CMI Policies Page](#). A Quality Manager may drop the sanction level from 3 to 2, awaiting the results of an investigation, if they are satisfied that the risk to the qualification validity has been managed and the particular malpractice is unlikely to be systemic or endemic. To do this, a Quality Manager may require a Centre to conduct 100% IQA on all claims for the qualification affected in the interim; instigate 100% moderation for the qualification affected in the interim; or both actions.

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 CMI Partner Connect system. Information will be retained for up to 5 years. However, where a decision against a Learner has resulted in a withdrawal, a reduced qualification or loss of membership, the record will be retained indefinitely for the purpose of attestation in line with [CMI's Data Privacy Policy](#).

If the outcome leads to invalid certificates or 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 notify other Awarding Bodies of cases of malpractice and/or maladministration where these cases are likely to impact 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 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 its operations to the other Awarding Body in an attempt to avoid sanctions and continue sub-standard practices.
- 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).
- If the CMI Centre is itself an awarding body/organisation, for example, a university, and the people implicated in the investigation are likely to apply to other universities for learning or employment. Notification will only be addressed where a formal request is received for attestation of a person's status with CMI.

Appeals against Malpractice/Maladministration decisions

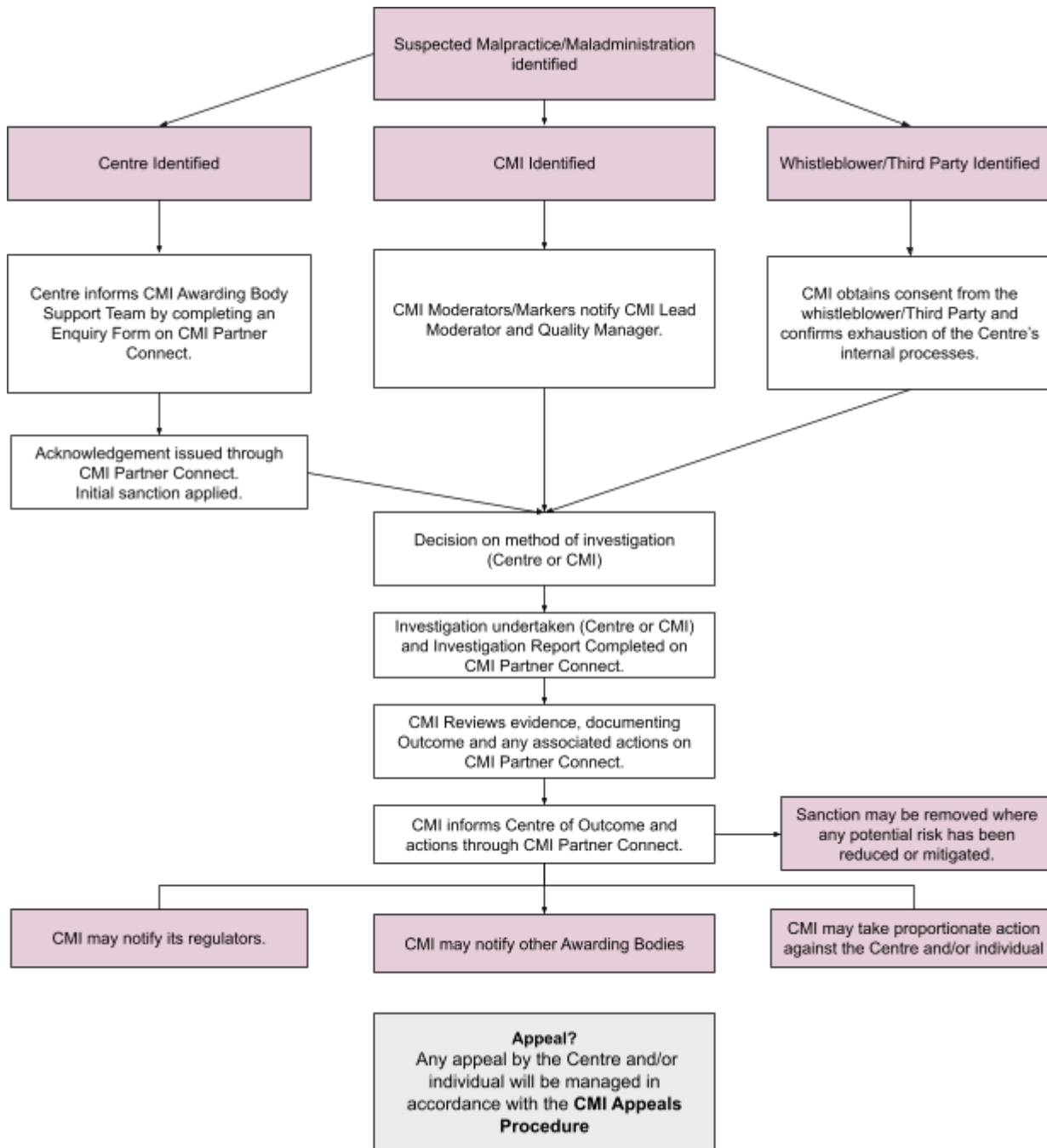
If a Centre or individual found to have committed malpractice and/or maladministration disagrees with the outcome, action or decision, they may submit an appeal. The appeal will consider whether the relevant processes were applied fairly and consistently. Further details are available in the CMI Appeals Policy and Procedure, accessible via the [CMI Policies Page](#).

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 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, which can be accessed on [CMI Policies Page](#) for more information.

Monitoring and Review

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

Appendix 1 - Reporting Flowchart



Appendix 2 - Non-Regulated Programmes

CMI offers Centres and Employers the ability to recognise their in-house programmes and map them to the [CMI Professional Standard](#). These programmes are not regulated by any of our regulatory bodies; however, they are subject to specific clauses within our agreements. Should Centres breach these agreements through misinterpretation of their provision, CMI reserves the right to apply sanctions in accordance with this malpractice and maladministration procedure and our [Sanctions Policy](#). CMI will carry out checks post approval and regularly to ensure that Centres are advertising their recognised programmes correctly, ensuring that they are continuing to adhere to guidance on programme titling as per the Partner Guidance and that there is no risk of misrepresentation.

Where any potential misrepresentation around the Centre's provision is identified, CMI will contact the Centre and request that changes are made within a set timescale. A sanction will be placed to stop any learner registrations from being made until the issue has been resolved. Where CMI is notified of any concerns around misrepresentation, a sanction will be placed, and CMI will raise an incident and conduct an investigation as per our [Investigation Procedure](#).

Although recognised programmes are not regulated by our Regulators, there are two Conditions of Recognition by Ofqual, CCEA Regulation and Qualifications Wales that CMI must adhere to.

These conditions are:

Statements regarding qualifications which are not regulated qualifications

B5.1 An Awarding Organisation must not (and must take all reasonable steps to ensure that any person connected with it does not) make any statement that would be likely to lead users of qualifications to believe that a qualification it makes available is a regulated qualification when it is not a regulated qualification.

Advertising and promotion of qualifications

B5.2 An Awarding Organisation must not (and must take all reasonable steps to ensure that any person connected with it does not) advertise or promote its qualifications in a manner that is likely to be misleading to users of qualifications.