

Sanctions Policy

1. Introduction JPIE responsibilities

As an awarding organisation recognised by the UK qualification regulator (Ofqual), JP International Examinations (JPIE) is responsible for ensuring that the regulated qualifications it designs, develops, and awards are delivered and assessed to a high standard in line with all our and any applicable regulatory requirements. Fulfilling this responsibility contributes toward maintaining recognition as an awarding organisation and a high level of public confidence in the qualifications available on the respective UK-regulated qualification frameworks.

2. Monitoring activities

JPIE carries out a range of standard external quality assurance (EJPIE) and other monitoring activities to ensure that approved Centres, Trainers, Assessors, and Internal Quality Assurers (IJPIEs) are meeting all JPIE and regulatory requirements concerning course administration, qualification delivery and Learner assessment. These activities include:

- Quality Assurance visits to Centres
- Moderation activity on course and learner assessment paperwork
- Invoice payment monitoring
- Financial and due diligence checks
- Identifying issues arising through the course of regular business

Through these monitoring activities, it may be identified that a Centre, Trainer, or Assessor is not meeting certain JPIE or regulatory requirements. If so, JPIE will assign actions and agreed target dates for completion to ensure the Centre maintains compliance. JPIE sets these to give the Centre an initial opportunity to resolve the situation concerning compliance without any further action being taken. JPIE has an enabling approach to compliance and provides support and guidance to centres on how to resolve compliance issues at this stage.

In cases where compliance issues have been identified which suggest either malpractice or maladministration has taken place at a Centre, JPIE may launch an investigation to establish the impact and severity of the scenario.

JPIE may also impose sanctions on those who fail to meet our requirements and/or those of our regulators. This policy provides Centres, Trainers, Assessors, IJPIEs and Learners with information on:

- the external quality assurance and other activities carried out by JPIE through which sanctions could be imposed
- the range and levels of sanctions available that may be imposed
- the impact that these sanctions will have on status or approval
- what to do when sanctions have been imposed to ensure (where possible) their removal

The type and level of sanctions that JPIE may impose on any Centre will be dependent on numerous factors, including the following:

- Risk to or level of impact upon:
 - the interests of Learners
 - the security and integrity of regulated qualifications
 - compliance with JPIE requirements
 - JPIE's reputation
 - JPIE's ability to maintain regulatory compliance
- Centre's previous record of maintaining compliance
- Centre's willingness to cooperate with JPIE to resolve compliance issues

3. Centres

3.1 Centre's responsibilities

JPIE approved Centres have a responsibility to ensure that all staff involved in the administration, delivery, assessment, and quality assurance of our qualifications are fully aware of

- all JPIE requirements
- the contents of this policy
- the possible implications for their Centre if JPIE requirements are not met.

If a Centre has been assigned actions by JPIE through any standard monitoring activity, then the Centre has a responsibility to ensure that the necessary work is carried out to close off the action and maintain compliance.

The Responsible Person for the Centre must ensure the necessary action is taken by the agreed date and make the appropriate staff members aware of what action they are responsible for carrying out.

If any assigned action is not carried out as required, JPIE may impose sanctions on the Centre, and these will remain in place until the situation concerning compliance (where possible) is resolved.

JPIE-approved Centres are responsible for taking all reasonable steps to prevent malpractice or maladministration from occurring when delivering JPIE qualifications and training and assessing Learners. If any malpractice or maladministration is identified, Centres must take all reasonable steps to mitigate the effect of any actual or potential *Adverse Effects*. Please refer to the *JPIE Malpractice and Maladministration Policy* for more detail in this respect.

3.2 Centre Sanctions

JPIE will impose sanctions appropriately and proportionately on a case-by-case basis dependent on the severity of the situation. To provide some examples, sanctions may be imposed as an outcome of standard monitoring activity when:

- The Centre has not completed actions assigned through an EJPIE Visit within the agreed timescale (the sanctions assigned will be dependent on the nature of the incomplete actions)
- JPIE Moderation activity has identified a repeated error with assessment marking at a Centre (this may lead to revocation of Direct Claims Status (DCS) for the Centre)

- There is insufficient IJPIE activity at the centre (this may lead to an enforcement of IJPIE activity by JPIE)
- The Centre has refused JPIE or the qualification regulators access to premises or records (this may lead to Centre suspension or cancellation if access is continually denied)
- The Centre has been unresponsive or repeatedly late in responding to communication from JPIE through the normal course of business (this may also lead to suspension until communication is made or cancellation)
- The Centre has been investigated or found guilty of malpractice or maladministration (a Centre will be suspended during any such investigation, and if malpractice or repeated maladministration is confirmed, then the Centre will be cancelled)
- The Centre has not actioned repeated requests to pay outstanding invoices (this will initially lead to the suspension of the ability to make purchases through JPIE and ultimately, should payment not be received, to Centre cancellation)

3.3 Centre Sanction Levels

Appendix 1 (Centre Sanctions) details the full range of sanctions and associated levels JPIE may impose on Centres.

3.4 Removing Sanctions

When JPIE imposes sanctions on a Centre, the Responsible Person will be informed of the sanctions imposed and the actions that must be carried out for compliance to be restored and the sanctions removed.

Should a Centre be unable or unwilling to carry out the necessary actions to facilitate the removal of sanction levels 1 to 4, then the level 5 sanction of cancellation may be imposed.

Centre sanctions will only be removed once the relevant actions have been taken and JPIE are satisfied that the identified compliance issues have been fully resolved.

4. Trainers/Assessors

4.1 Responsibilities

When a Trainer, Assessor or IJPIE becomes approved with JPIE, they are required to deliver training, assess Learners and/or carry out internal quality assurance in line with the requirements outlined in the following JPIE documents:

- *Assessor and Code of Conduct*
- *Centre Quality Assurance Guidance*
- *Centre Handbook*
- *Qualification Specifications and Assessment Guidance*

Trainers and Assessors are responsible for ensuring that they are fully aware of and understand the content of these documents. They are also required to be aware of the contents of this policy document and the possible implications for them as approved Trainers and Assessors if they do not meet JPIE requirements relating to qualification delivery, Learner assessment and internal quality assurance.

Trainers and Assessors are also responsible for ensuring that Learners are aware of all relevant information before any course commencing.

JPIE monitors Trainer and Assessor performance through our standard external quality assurance activities. When compliance issues are identified through these activities, then the Centre and/or the Trainer or Assessor in question may be assigned actions to resolve the issues.

In cases when these actions have not been carried out by the agreed timescales and compliance remains an issue, JPIE may impose sanctions on the Centre and/or individual Trainers, Assessors or IJPIEs. JPIE also reserves the right to impose sanctions on Trainers, Assessors or IJPIEs when initiating or after concluding a compliance investigation.

4.2 Trainer/Assessor Sanctions

To provide some examples, sanctions may be imposed on Trainers or Assessors as an outcome of standard monitoring activity when

- Insufficient IJPIE activity has been identified through an EJPIE visit (JPIE may enforce that IJPIE activity be carried out on courses delivered by a specific Trainer)
- Trainer/Assessor/IJPIE qualifications or continuing professional development (CPD) portfolios are no longer current and up-to-date in line with approval requirements (JPIE will lapse the approved status of the Trainer/ Assessor/IJPIE until currency is achieved)
- Concerns have been raised over course delivery or Learner assessment (JPIE may revoke the Direct Claims status of a specific Trainer or Assessor due to concerns over course delivery or Learner assessment)
- Trainers/Assessors have not maintained the integrity and security of the assessment process by failing to control or deliberately allowing unauthorised access to Assessment Guidance documents (JPIE may suspend a specific Trainer, Assessor or IJPIE pending investigation)

4.3 Trainer/Assessor/IJPIE Sanction Levels

Appendix 2 (Trainer/Assessor Sanctions) details the full range of sanctions and associated levels JPIE may impose on Trainers/Assessors if deemed necessary.

4.4 Removing Sanctions

When JPIE imposes sanctions on a Trainer or Assessor, the Responsible Person for the Centre and the individual in question will be informed of the actions that must be carried out for compliance to be restored and sanctions removed.

Should a Trainer or Assessor be unable or unwilling to carry out the necessary actions to facilitate the removal of sanctions Levels 1 to 4, then the Level 5 sanction of cancellation may be imposed. Dependent on circumstances, this may also lead to sanctions being imposed on the Centre.

Sanctions will only be removed once the relevant actions have been taken and JPIE are satisfied that the identified compliance issues have been fully resolved.

5. Learners

5.1 Learner responsibilities

JPIE expects that a Learner undertaking any JPIE qualification will

- Provide all necessary evidence to confirm they meet the entry requirements (where applicable)
- Declare any illnesses or conditions that they may have before course commencement (for Reasonable Adjustments being made)
- Behave professionally and courteously at all times towards Centre staff and other Learners
- Prepare for and take part in any training activities and Learner assessments as instructed by their Trainer/ Assessor delivering their course
- Complete all registration and assessment paperwork in a clear and legible fashion
- Maintain the integrity and security of the Learner assessment process
- Declare any illnesses or conditions that they may have on the day of training or assessment (for Special Consideration being given)
- Cooperate fully with the Centre and/or JPIE through the course of any compliance investigation (if required)

JPIE monitors Learner assessments through our standard external quality assurance activities (e.g. course moderation). Through these activities, evidence may be obtained that Learner plagiarism, cheating or collusion may have occurred.

When such issues are identified, JPIE will launch an investigation. The Responsible Person for the Centre and the Trainers/Assessors/IJPIEs involved in Learner assessment and quality assurance will be informed and asked to provide further information and evidence to support the investigation activities.

The Learner (or Learners) will also be informed of the investigation and asked to provide information supporting their case against the suspected plagiarism, cheating or collusion.

JPIE may suspend the Learner (or Learners) at this stage while the investigation is carried out. Dependent on the circumstances, JPIE may also suspend the Centre or any Trainer/Assessor/IJPIE if this is deemed necessary.

At the end of the investigation, if the evidence confirms that Learner plagiarism, cheating or collusion has occurred, then JPIE may impose sanctions on the Learner. Again, depending on the circumstances, JPIE may impose sanctions on the Centre or any Trainers/Assessors/IJPIEs involved.

5.2 Learner Sanctions

To provide examples, sanctions may be imposed on Learners as an outcome of standard monitoring activity when

- A cohort of Learners have submitted workbook assessments which contain text that is highly similar to the others (JPIE may initially suspend a Learner or Learners pending investigation of possible plagiarism or collusion)

- A Learner has submitted a workbook assessment that contains text which is the same as that contained in the JPIE Assessment Guidance intended for Trainer/Assessor use only (JPIE may initially suspend the Learner and/or any Trainer/Assessor involved pending investigation)
- JPIE has obtained information suggesting that a Learner undertaking a Multiple Choice Question (MCQ) paper assessment was attempting to copy other Learners' answers (JPIE may initially withhold certification and/or suspend Learners pending investigation of possible cheating)

5.3 Learner Sanction Levels

Appendix 3 (Learner Sanctions) details the full range of sanctions and associated levels JPIE may impose on Learners if deemed necessary.

5.4 Removing Sanctions

When JPIE imposes Level 3 sanctions on any Learner, the sanction will be lifted once the identified action has been taken (i.e. an assessment or course has been retaken).

Concerning Learner suspension and after any compliance investigation has been concluded, JPIE will inform Learners if the suspension has been lifted and whether or not any further sanctions have been applied (e.g. an indefinite ban may be imposed if plagiarism, cheating or collusion has been confirmed).

In cases where a Learner has been issued a certificate for a qualification and subsequently found guilty of plagiarism, cheating or collusion in relation to the qualification assessment(s), JPIE will revoke the certificate issued.

6. Policy Review

JPIE will review this policy on an ongoing basis as part of our continuous improvement activities and revise it as and when necessary in response to customer feedback, changes in our practices or the outcome of investigations.

In addition, we may update this policy in light of operational feedback to ensure our arrangements for imposing and removing sanctions remain effective.

Appendix 1 Centre Sanction

Level	Sanction
	The following sanctions may be assigned by JPIE
1	Enforcement of Pre-Course Registration in relation to the Centre and: 1.1 a specific qualification(s) 1.2 a suite of qualifications 1.3 more than one suite of qualifications 1.4 all qualifications/suites of qualifications
2	Revocation of Direct Claims Status in relation to the Centre and: 2.1 a suite of qualifications 2.2 more than one suite of qualifications 2.3 all qualifications/suites of qualifications Revocation of Credit Facility in relation to the Centre
3	Enforcement of Internal Quality Assurance Activity in relation to the Centre and: 3.1 a specific qualification(s) 3.2 a suite of qualifications 3.3 more than one suite of qualifications 3.4 all qualification/suites of qualifications
4	Suspension of approved status in relation to: 4.1 the Centre Suspension of approved status in relation to: 4.2 a specific qualification(s) 4.3 a suite of qualifications 4.4 more than one suite of qualifications 4.5 all qualifications/suites of qualifications Suspension of the ability to make purchases through JPIE in relation to: 4.6 the Centre Revocation of JPIE Customer Portal access in relation to: 4.7 the Centre Withholding of Learner Certificates in relation to: 4.8 an investigation into possible malpractice/maladministration by the Centre Revocation of Learner Certificates in relation to: 4.9 confirmed malpractice/maladministration during course delivery or Learner assessment by the Centre

5	<p>Cancellation of approved status in relation to:</p> <p>5.1 the Centre</p> <p>Cancellation of approved status in relation to the Centre and:</p> <p>5.2 a specific qualification(s) 5.3 a suite of qualifications 5.4 more than one suite of qualifications 5.5 all qualifications/suites of qualifications</p>
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Appendix 2 Trainer/Assessor/IJPIE Sanctions

Level	Sanction
	The following sanctions may be assigned by JPIE
1	Enforcement of Pre-Course Registration in relation to the Trainer/Assessor: 1.1 a specific Centre and a specific qualification(s) 1.2 a specific Centre and a specific suite(s) 1.3 and a specific qualification(s) across all Centres 1.4 a specific suite(s) across all Centres 1.5 and all qualifications/suites across all Centres
2	n/a
3	Enforcement of Internal Quality Assurance Activity in relation to the Trainer/Assessor and: 3.1 a specific Centre and a specific qualification(s) 3.2 a specific Centre and a specific suite(s) 3.3 a specific qualification(s) across all Centres 3.4 a specific suite(s) across all Centres 3.5 all qualifications/suites across all Centres
4	Suspension of approved status in relation to: 4.1 the Trainer/Assessor/IJPIE Revocation of JPIE Customer Portal access in relation to: 4.2 the Trainer/Assessor/IJPIE
5	Cancellation of approved status in relation to: 5.1 the Trainer/Assessor/IJPIE

Appendix 3 Learner Sanctions

Level	Sanction
	The following sanctions may be assigned by JPIE
1	n/a
2	n/a
3	Requirement for the Learner to: 3.1 retake a specific assessment(s) 3.2 retake a specific course(s)
4	Imposition of a Learner Suspension in relation to: 4.1 the investigation of possible plagiarism, cheating or collusion Withholding of Learner Certificates in relation to: 4.2 the investigation of possible plagiarism, cheating or collusion Imposition of a ban on the Learner: 4.3 for a specified period of time Revocation of Learner certificate in relation to: 4.4 confirmed plagiarism or collusion
5	Imposition of a ban on the Learner: 5.1 for an indefinite period