



# **OCN London Malpractice and Maladministration Policy and Procedure**

Guidelines and arrangements relating to suspected or actual malpractice or maladministration with reference to OCN London qualifications and units of qualifications

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## Introduction

This document aims to:

- Comply with Condition A8 – Malpractice and maladministration of the Regulator’s General Conditions of Recognition;
- Define malpractice and maladministration in the context of qualification delivery and assessment;
- Set out the rights and responsibilities of OCN London, centre staff and learners in relation to such matters. Describe the procedures to be followed in cases where there is reason to suspect that the regulations have been broken.

### 1. Definition of malpractice

- 1.1. Malpractice is deemed to be those deliberate actions and practices which compromise, or attempt to compromise, the integrity of assessment and the validity of results or certificates.

### 2. Definition of maladministration

- 2.1. Maladministration is deemed to be where the management or administration of records or conduct of delivery results in persistent and/or widespread errors or poor administration within a centre which undermines the integrity of the internal assessment process and/or the integrity or validity of a regulated qualification.

### 3. Centre led malpractice

- 3.1. Centre led malpractice means malpractice committed by a member of the centre’s staff or contractor at a centre or an individual appointed in another capacity at a centre such as a practical assistant, a scribe or a Sign Language interpreter.

Examples of staff malpractice are given in **Appendix 1**.

### 4. Learner led malpractice

- 4.1. Learner led malpractice means malpractice committed by a learner in relation to summative assessment or the production of coursework used in the compilation of portfolios of evidence of learning.

Examples of learner malpractice are given in **Appendix 1**.

## 5. Policy statement

- 5.1. OCN London is committed to taking all reasonable steps to prevent malpractice and maladministration of any kind, and to dealing with any cases which arise in a timely, fair and proportionate way in order to protect the integrity of the award of its qualifications and ensure fairness to centres and learners.
- 5.2. This policy is aimed at OCN London customers, including learners, who are delivering/registered on OCN London approved qualifications or units, within or outside the UK and who are involved in suspected or actual malpractice and/or maladministration. It is also for use by OCN London staff to ensure they deal with all malpractice and maladministration investigations in a consistent manner.
- 5.3. It is important that staff involved in the management, assessment and quality assurance of OCN London qualifications, and their learners, are fully aware of the contents of the policy and that centres have arrangements in place to prevent and investigate suspected instances of malpractice and maladministration. These arrangements should be explicit in the centre's own Malpractice/Maladministration policy.
- 5.4. Anyone who identifies or is made aware of suspected or actual cases of malpractice or maladministration at any time **must immediately notify OCN London**. Allegations of malpractice may be made by heads of centres, assessors, moderators, lecturers/tutors, managers, learners and members of the public.
- 5.5. Failure to report suspected or actual malpractice/maladministration cases, or to have in place effective arrangements to prevent such cases, may lead to sanctions being imposed on a centre. Also, failure to take action as required by OCN London or failure to co-operate with OCN London's investigation may itself constitute malpractice.

## 6. Instances of malpractice or maladministration

- 6.1. Instances of malpractice and maladministration arise for a variety of reasons:
  - Some are intentional actions which aim to give an unfair advantage in an assessment;
  - Some arise due to a lack of knowledge or understanding of the regulations or carelessness/forgetfulness in applying the regulations;
  - Some occur as a direct result of circumstances which are beyond the control of those involved.

6.2. The individuals involved also vary. They may be:

- learners;
- teachers, lecturers, trainers, assessors, internal or external moderators;
- other third parties, e.g. parents, siblings, friends of the learners.

Irrespective of the cause or the people involved, all allegations of malpractice in relation to assessments must be investigated. This is to protect the integrity of the qualifications and certificates, and to be fair to the centre and all learners.

## 7. Responsibilities

7.1. The regulators' General Conditions of Recognition (Condition A8.3) state that awarding organisations must:

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

7.2. OCN London will:

- Reserve the right to withhold the award of certificates, withhold the registration of further learners or suspend centre recognition, while investigations are ongoing. Depending on the outcome of the investigation certificates may be released or permanently withheld;
- Apply the sanctions listed in Appendix 2 of this document in cases of proven malpractice;
- Report the matter to the regulators and other awarding organisations, where appropriate and in accordance with the regulators' General Conditions of Recognition';
- Consider reporting the matter to the police if proven malpractice involves the committing of a criminal act;
- Consider reporting the incident to other appropriate authorities where relevant, e.g. funding agencies.

- 7.3. It is the responsibility of the head of centre to carry out an investigation into any case of suspected malpractice by a learner, as directed by OCN London, and to keep OCN London informed of its progress.
- 7.4. If it is necessary to delegate an investigation to a senior member of centre staff, the person chosen must be independent and not connected to the department or the learner involved in the suspected malpractice; this avoids conflicts of interest which could otherwise compromise the investigation.
- 7.5. Investigations into any case of suspected centre led malpractice will normally be carried out by one or more members of the OCN London quality and standards team and facilitated by the head of centre or relevant employer.

## **8. Procedures for dealing with allegations of malpractice**

- 8.1. The handling of malpractice and / or maladministration complaints and allegations involves the following stages:
  - The allegation
  - OCN London's response
  - The investigation
  - The report
  - The decision
  - The appeal

## **9. Communications**

- 9.1. In all cases OCN London will tell the person making the allegation who will be handling the matter, their contact details and what further assistance OCN London may need.
- 9.2. In cases of suspected or actual malpractice or maladministration at a centre, and where it is deemed appropriate, OCN London will notify the head of the centre involved that OCN London will be investigating the matter, except when the head of centre or management of the centre is under investigation. In such cases the Chair of the Board/Governors or other appropriate governance authorities will be contacted.
- 9.3. In some cases, OCN London may communicate directly with members of staff who have been accused of malpractice and / or maladministration if the circumstances warrant this, e.g. the individual is no longer employed/engaged with the centre. The heads of centre must facilitate communications between OCN London and the individual concerned.

- 9.4. In certain circumstances, for example, when a learner's account of events differs with that of the centre's, OCN London may deal directly with the learner or their representative. In such cases OCN London will advise the head of centre in writing that it proposes to deal directly with the learner. Once advised by OCN London the head of centre should not communicate further with the learner.
- 9.5. OCN London may need to share information relevant to malpractice and / or maladministration investigations with third parties, for example other awarding organisations, the regulators, the police or other bodies.

## **10. Process for making an allegation of malpractice or maladministration**

### Suspected malpractice and / or maladministration identified by a lecturer/tutor, internal or external moderator

- 10.1. Lecturers/tutors, internal and external moderators who suspect malpractice and / or maladministration in an assessment process must notify OCN London immediately. All allegations must include, where possible:
- Centre's name and address;
  - Learner's name and OCN London registration number (where relevant);
  - Details of any personnel involved in the case;
  - Details of the OCN London qualification affected;
  - Nature of the suspected or actual malpractice and / or maladministration and associated dates.
- 10.2. In addition, OCN London will ask that the person making the allegation declares any personal interest they may have in the matter to us at the outset.
- 10.3. **Where the malpractice by learners in coursework or assessment has been identified prior to the work being submitted for certification, the matter must be dealt with in accordance with the centre's internal procedures.**

### Suspected malpractice and / or maladministration reported by others

- 10.4. Allegations are sometimes reported by third parties. Sometimes these reports are anonymous or the person making the allegation does not wish their details to be shared.

- 10.5. If the person making the allegation is concerned about possible adverse consequences that may occur should their identity be revealed to another party OCN London will work to ensure their details are not revealed. However, if the complaint leads to issues that need to be taken forward by other parties, such as the police (fraud or other criminal offence), the courts or the regulatory authorities (Ofqual/QAA), it may be necessary to disclose their identity in which case OCN London would inform them first.
- 10.6. If the allegation is made over the phone the informant will normally be asked to confirm the allegation in writing.
- 10.7. When OCN London receives an allegation from someone other than the head of a centre (including anonymous reports) OCN London will evaluate the allegation in the light of any available information to establish whether there is cause to investigate.
- 10.8. Anonymous reports will only be acted upon if there is supporting evidence, or if the nature of the report warrants it. In these cases, the head of centre or their representative will be informed and asked to comment and/or co-operate with the investigation.

## **11. OCN London's response to an allegation of serious malpractice and / or maladministration**

- 11.1. OCN London will seek to establish the full facts and circumstances of any alleged malpractice and / or maladministration of a serious nature. OCN London will take allegations that could lead to an 'Adverse Effect', as 'serious' in this context.
- 11.2. In the case of notifications of suspected malpractice and / or maladministration from lecturers/tutors, internal and external moderators, the regulator or members of the public (including informants) OCN London will consider the information provided and decide to:
  - take no further action or;
  - ask the head of centre to conduct a full investigation into the alleged malpractice and / or maladministration and submit a written report or;
  - investigate the matter directly.



11.3. On receipt of a notification of suspected malpractice and / or maladministration from a head of centre OCN London will consider the information provided and decide to:

- take no further action or;
- if the notification takes the form of a report, make a decision on the case in accordance with our stated procedures or;
- ask the head of centre to carry out a further investigation and provide further evidence or;
- investigate the matter directly.

## 12. Investigations

12.1. Where possible OCN London will aim to complete the investigation within 15 working days of receipt of the allegation. In some cases, the investigation may take longer, for example if a centre visit is required.

12.2. All investigations will be conducted in a fair, reasonable and legal manner ensuring all relevant evidence is considered without bias. Investigations will aim to:

- Establish the facts relating to allegations/complaints in order to determine whether any irregularities have occurred;
- Identify the cause of irregularities and those involved;
- Establish the scale of the irregularities and whether other qualifications may be affected;
- Evaluate any action already taken by the centre;
- Determine whether remedial action is required to reduce the risk to current registered learners and to preserve the integrity of the qualification;
- Ascertain whether any action is required in respect of certificates already issued;
- Obtain clear evidence to support any sanctions to be applied to the centre and/or to members of staff, in accordance with our Sanctions policy.

OCN London reserves the right to conduct any investigation where it feels that it is the most appropriate course of action at any stage. The decision making as to who investigates always rests with the Responsible Officer at OCN London.

### Investigation of suspected malpractice by learners

- 12.3. Where investigations are carried out by the head of centre or their representative, they must deal with it in accordance with the deadlines set by OCN London and keep OCN London apprised of its progress.
- 12.4. Those responsible for conducting an investigation should seek evidence from which the full facts and circumstances of any alleged malpractice and / or maladministration can be established. It should not be assumed that because an allegation has been made it is true.
- 12.5. The head of centre or their representative, should consider that both learners and staff can be responsible for malpractice and / or maladministration.
- 12.6. If the investigation is delegated by the head of centre to another senior member of staff the head of centre retains overall responsibility for the investigation. In selecting a suitable senior member of staff, the head of centre must take all reasonable steps to avoid a conflict of interest. In the event of any concerns regarding conflicts of interest the head of centre must contact OCN London immediately to discuss the matter.
- 12.7. Individuals suspected of malpractice and / or maladministration must be made fully aware, in writing, at the earliest opportunity of the nature of the alleged malpractice and / or maladministration and of the possible consequences should malpractice and / or maladministration be proven.
- 12.8. Where the person conducting the investigation deems it necessary to interview a learner or member of staff in connection with alleged malpractice and / or maladministration, the interviews must be conducted in accordance with the centre's own policy for conducting disciplinary enquiries.
- 12.9. Learners suspected of malpractice and / or maladministration must be given the opportunity to respond, preferably in writing, to allegations made.
- 12.10. Learners suspected of malpractice and / or maladministration must be made aware of the routes for appealing should a judgment be made against them. The OCN London [Appeals Policy](#) can be found on the OCN London website at <http://www.ocnlondon.org.uk/centres/centre-area/policies-and-procedures.aspx>
- 12.11. OCN London will review the report and evidence submitted and decide what further action is required. In some cases, it may be necessary for OCN London to interview a learner/s in the pursuance of an investigation. OCN London undertake to only do this in the presence of the head of centre, or other senior member of staff, and then only after ensuring that the learner has been given the opportunity to be accompanied by an advocate.

## Investigation of suspected malpractice by members of staff

- 12.12. Investigations into any case of suspected malpractice against a member of staff will normally be carried out by one or more members of the OCN London quality and standards team and facilitated by the head of centre or relevant employer. Checks will be made to ensure there is no conflict of interest.
- 12.13. Investigations into any case of suspected malpractice against the head of centre will normally be carried out by the OCN London Head of Quality and Product Development and facilitated by an appropriate senior officer of the centre, or the responsible employer.
- 12.14. OCN London will not normally withhold from the head of centre any evidence relevant to cases of suspected malpractice. Occasionally it may be necessary to do so, for example where it is necessary to protect the identity of an informant. In all such cases OCN London will provide summaries of evidence and a statement as to why evidence itself cannot be presented in its original form.
- 12.15. Any member of staff suspected of malpractice must be made fully aware, in writing, at the earliest opportunity of the nature of the suspected malpractice and the Company's disciplinary procedure will be followed should malpractice be proven.
- 12.16. When it is necessary for a member of OCN London to conduct an interview with a staff member, the member of staff being interviewed may be accompanied by a friend or advisor. In such cases OCN London must be informed beforehand. The accompanying person should not take an active part in the interview and must not answer questions on the interviewer's behalf.
- 12.17. The head of centres will be required to make available an appropriate venue for such interviews.
- 12.18. Any member of staff suspected of malpractice must have the opportunity to respond, preferably in writing, to allegations made.
- 12.19. A member of staff suspected of malpractice must be aware of the routes for appealing should a judgment be made against them. The OCN London [Appeals Policy](#) can be found on the OCN London website at <http://www.ocnlondon.org.uk/centres/centre-area/policies-and-procedures.aspx>

## 13. Reporting

13.1. Where an investigation is carried out by the centre, it is the responsibility of the head of centre to submit to OCN London a full written report malpractice and / or maladministration and to provide the following where appropriate:

- A statement of the facts, a detailed account of the circumstances and details of investigations carried out by the centre;
- Evidence relevant to the allegation such as written statement(s) from the assessor(s), internal moderator(s) or other staff concerned;
- Written statement(s) from any learner(s) subject to investigation and from any other learner(s) concerned;
- Any mitigating factors;
- Information from the centre's procedures for advising learners of OCN London regulations;
- Details of any unauthorised material found in the assessment room;
- Any work of the learner and any associated material that is relevant to the investigation.

13.2. Where an investigation is carried out by OCN London, the Head of Quality and Product Development will lead the investigation unless there is a conflict of interest, in which case the Responsible Officer will appoint another OCN London officer. A full written report will be submitted to the Responsible Officer, providing the following where appropriate:

- A statement of the facts, a detailed account of the circumstances and details of investigations carried out);
- Evidence relevant to the allegation such as written statement(s) from OCN London External Moderator(s) and/or any other OCN London staff members concerned;
- Written statement(s) from any centre staff member(s) who are subject to investigation and as may be appropriate from any other centre staff member(s) concerned;
- Information from the centre's procedures for advising staff of OCN London regulations;

- Details of any unauthorised material found in the assessment room;
- Any work of the learner and any associated material that is relevant to the investigation.

## **14. The response of OCN London to reports**

- 14.1. Where an investigation indicates evidence of malpractice and / or serious maladministration, OCN London will appoint a panel, chaired by a member of the OCN London Board and comprising at least three members, to scrutinise the alleged malpractice and / or maladministration. The composition of the panel will be independent of those who have conducted the investigation. OCN London officers who have directly investigated the case will play no role in the decision-making process.
- 14.2. Information supplied to the malpractice and / or maladministration panel will be only that which is directly relevant to the case and which has been made available to the person(s) against whom the allegation has been made.
- 14.3. The panel may delegate responsibility for deciding certain straightforward cases to named officers of OCN London.
- 14.4. The panel must establish that correct procedures have been followed in the investigation of cases.
- 14.5. The panel, or officers acting under delegated authority, will determine:
  - Whether the assessment regulations have been broken;
  - Where the culpability lies for the breach of regulations;
  - Appropriate measures to be taken to protect the integrity of the assessment, qualification(s) or awards and to prevent future breaches;
  - The nature of any sanctions to be applied or actions to be taken.

Each case of suspected malpractice and / or maladministration will be considered and judged on an individual basis in the light of all information available.

- 14.6. OCN London will impose sanctions on individuals found guilty of breaking assessment regulations in order to:
- Maintain the integrity of the assessment, qualification or awards and confidence in assessment, qualification(s) or awards;
  - Ensure that there is nothing to gain from breaking the regulations;
  - Deter others from doing likewise.

## **15. Sanctions applied against members of staff and Centres**

- 15.1. Where an investigation establishes malpractice and / or maladministration by a centre's member of staff, any subsequent disciplinary action against the member of staff concerned must be the responsibility of the centre's Head of centre, or the responsible employer.
- 15.2. OCN London will consider whether the integrity of its assessment might be jeopardised if a member of staff found to have indulged in unfair practice were to be involved in the conduct, supervision or administration of OCN London assessments in the future.
- 15.3. Where a member of staff has been found guilty of malpractice and / or maladministration, OCN London has the right to impose special conditions on the future involvement in assessment by that member of staff, whether this involves the conduct, supervision or administration of assessments.
- 15.4. OCN London may refuse to accept assessment entries from a Centre where malpractice and / or maladministration has been established, or where malpractice and / or maladministration is strongly suspected.
- 15.5. OCN London may withdraw Centre Recognition to deliver OCN London qualifications and units of OCN London qualifications where malpractice and / or maladministration is established, or where malpractice and / or maladministration is strongly suspected.

## 16. Sanctions applied against learners

16.1. OCN London may, at its discretion, impose the following sanctions against learners found guilty of breaking the regulations:

- The learner is issued with a warning;
- The learner loses all credit gained for a unit;
- The learner loses all credit gained from all units in a single qualification (units which have been awarded are retained);
- The learner is disqualified from the whole qualification;
- The learner is barred from entering for one or more assessments for a set period of time (this penalty may be applied in certain circumstances with any of the other penalties above);
- Where deliberate fraud of a serious nature seems likely, the learner may be reported to the police.

### Notes:

- Not all of the penalties may be appropriate for all OCN London qualifications
- The head of centre retains sole discretion to take any further action they themselves deem appropriate.

## 17. Applying sanctions

- 17.1. The application of sanctions is at the discretion of OCN London, in accordance with its Centre Sanctions Framework for Regulated Qualifications (see Appendix 2) and will reflect the particular circumstances of each case and any mitigating factors.
- 17.2. Sanctions will be based only on the evidence presented.
- 17.3. All sanctions must be justifiable and proportionate and consistent in their application.
- 17.4. For reasons of consistency of approach in the application of sanctions, OCN London will not take into account any consequential effects of a particular sanction which might arise from the circumstances of the individual.

- 17.5. Sanctions applied will remain on record at OCN London. The investigation report will be attached to the centre's record in the OCN London Quartz database and reference to it will be added to the notes section. The report will also be noted on the OCN London Switchboard database which is used for recording quality engagements. This ensures Centre Moderators will report on actions relating to sanctions applied.

## **18. Communicating decisions to learners, staff and centres**

- 18.1. The head of centre/relevant employer will be informed of decisions in writing / by email as soon as possible after decisions are made. It is the responsibility of the head of centre/relevant employer to communicate the decision to the individuals concerned and to pass on warnings in cases where this is relevant.

## **19. Exchange of information with other awarding organisations and authorities**

- 19.1. In cases of serious malpractice, in order to preserve the integrity of the assessment, it may be necessary for information to be exchanged with other awarding organisations. Where centre recognition has been suspended, awarding organisations delivering qualifications in similar sectors will be informed in line with Ofqual Condition of Recognition A8.7(b).
- 19.2. In all instances of serious malpractice and / or maladministration, specifically where a potential or actual Adverse Effect has been identified, OCN London will promptly report the case to the qualifications regulators.
- 19.3. Where there is any suggestion of criminal activity, the Police will be informed.
- 19.4. OCN London will inform the qualifications regulators whenever it finds evidence that certificates may be invalid and agree appropriate remedial action.

## **20. Appeals**

- 20.1. OCN London has established procedures for considering appeals arising from the outcomes of an investigation into malpractice and / or maladministration. The OCN London [Appeals Policy](#) can be found on the OCN London website.



## **21. Vexatious correspondence, behaviour or allegations**

- 21.1. OCN London staff will not engage with persistent or harassing contact from those making allegations of malpractice or maladministration or those who may be the subject of an investigation.
- 21.2. If this kind of behaviour occurs, OCN London will treat it as vexatious. Vexatious behaviour includes, but is not limited to:
- Abusive, intimidating or threatening written or telephone correspondence or physical behaviour in a face to face meeting;
  - Persistent repeated contact without providing any new information or evidence;
  - Making unreasonable demands on OCN London staff, e.g. outside the remit of the allegation;
  - Making malicious remarks about or against OCN London, OCN London staff or representatives, or OCN London centres.
- 21.3. OCN London will also treat as vexatious behaviour making allegations known to be false/inaccurate.
- 21.4. Vexatious behaviour will be reported to the Deputy Chief Executive Officer or Chief Executive Officer to be dealt with appropriately, which may include reporting to the police where an offence has been committed. All vexatious behaviour will be reported to the OCN London Quality and Standards Committee and to the Board of Trustees.

## **22. Review arrangements**

- 22.1. OCN London will review this policy and the procedures annually as part of our self-evaluation and revise it as and when necessary.

## Appendix 1 : Examples of malpractice and maladministration

### 1. Examples of malpractice by centre staff

The following are examples of malpractice by Centre staff. Other instances of malpractice may be considered by OCN London at its discretion:

- Giving inappropriate assistance to learners in assessments;
- Falsifying, or making any changes to, learners' assessed work;
- Falsifying learner records, assessment/examination records, internal quality assurance records and/or authentication statements;
- Persistent and deliberate failure to comply with requirements for qualification delivery;
- Deliberate failure to conduct a proper investigation into suspected/alleged malpractice (of staff or learners);
- Making fraudulent claims for qualifications;
- Discrimination against or bias towards any learner/s;
- Denial of access to records, information, learners and staff to any authorised OCN London representative and/or the regulatory authorities (relating to the delivery and assessment of OCN London qualifications);
- Deliberate misuse of the OCN London logo, brand, name and trademarks, or misrepresentation of a centre's relationship with OCN London and/or its recognition and approval status with OCN London;
- Intentional withholding of information from OCN London which is critical to maintaining the rigour of quality assurance and standards of qualifications;
- Deliberate failure to carry out internal assessment and/or internal moderation in accordance with OCN London requirements;
- Deliberate failure to continually adhere to OCN London centre recognition and/or qualification approval requirements;
- Permitting collusion in assessment cheating.

## Additional examples : Summer 2020 awarding

### Calculated grades

- Inappropriate registration of learners i.e. registrations of learners who were not studying a course before 20<sup>th</sup> March and who would not have been entered for assessments;
- Registration of learners with multiple awarding organisations for the same or similar qualifications;
- False centre assessed grades e.g. inflating and/or reduce results, or basing judgement below the minimum evidential threshold (i.e. one piece of trusted evidence);
- Falsified evidence;
- Failure to authenticate learner identity and/or evidence;
- Abuse/ inappropriate application of reasonable adjustments and special consideration policies;
- Bribery and corruption including malpractice linked to criminality;
- Sharing centre assessed grades with learners and parents in advance of completion of the quality assurance process;
- Failure to follow process set out by the OCN London e.g. HoC sign off, internal authentication;
- Refusal to co-operate with OCN London, exerts pressure to change the stated mitigation.

### Adaptation

- Failure to authenticate learner identity and/or evidence – fraud, false identities, lack of any assessment taking place;
- Failure to apply or abuse of reasonable adjustment and/or special consideration policies;
- Abuse of Direct Claim Status.

## **2. Examples of malpractice by learners**

The following are examples of malpractice by learners. Other instances of malpractice may be considered by OCN London at its discretion:

- The deliberate use of unauthorised and or inappropriate materials/equipment in assessment settings, for example notes or mobile phones;
- Copying from another learner (including using IT to do so);
- The inclusion of inappropriate, offensive or obscene material in assessment tasks;
- The deliberate destruction of another's work;
- Deliberate plagiarism;
- Deliberately behaving in such a way as to undermine the integrity of the assessment;
- Impersonation – assuming the identity of another learner or having someone assume their identity in relation to an assessment;
- Deliberate submission of false information to gain a qualification/unit;
- Selling certificates or assessment details.

## **3. Examples of maladministration**

The following are examples of maladministration. Other instances of maladministration may be considered by OCN London at its discretion:

- Persistent failure to adhere to OCN London learner registration and certification procedures;
- Consistently failing to identify issues of authenticity in work submitted by learners for assessment;
- Persistent failure to adhere to OCN London centre recognition and/or qualifications requirements;
- Inaccurate claim for certificates;
- Failing to keep effective records;
- Failing to maintain appropriate auditable records e.g. certification claims;

- Withholding or the delaying of information, by deliberate act or omission, which is required to assure OCN London of the centre's ability to deliver qualifications appropriately;
- Misuse of the OCN London logo and trademarks or misrepresentation of a centre's relationship with OCN London and/or its recognition and approval status with OCN London;
- Persistent poor administration arrangements;
- Failure to adhere to the requirements of our Access to Fair Assessment Policy and Procedure.

## Appendix 2 : Centre sanctions framework for regulated qualifications

<b>Level of intervention</b>	<b>Nature of sanction</b>	<b>Sanction agreed by</b>	<b>Rationale for sanction</b>	<b>Intervention point (will vary between centres)</b>
1	Centre quality improvement plan	Centre Moderator	Some issues to be addressed	Course leader
2	Additional external quality monitoring activity; suspension of direct claims status (where held)	Quality and Standards Manager	More serious and/or continuing issues requiring more frequent monitoring	Curriculum Manager
3	Management discussion and plan for improvement	Quality and Standards Manager / Deputy Chief Executive	Potential threat to integrity of quality and standards of OCN London qualifications	Head of Quality and Head of School / Department
4	Suspension of learner certification and/or further learner registration	Deputy Chief Executive	Breakdown of trust in delivery of specific qualification(s)	Head of Quality and Vice Principal / Managing Director
5	Withdrawal of approval to deliver particular qualification(s)	Chief Executive	Irretrievable breakdown of trust in delivery of specific qualification(s)	Vice Principal / Managing Director
6	Withdrawal of centre approval	Quality and Standards Committee (on behalf of Board of Trustees)	Irretrievable breakdown of trust in delivery across the centre	Principal / Chief Executive