

External Malpractice Policy



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VERSION CONTROL

Version number	Summary of change	Date changed
V1	Policy creation	December 2024
V2	New policy template, review and update to process	July 2025

INTRODUCTION

Certify Training Qualifications Ltd (CTQ) is committed to delivering qualifications with integrity, fairness, and regulatory compliance. While CTQ takes all reasonable steps to prevent malpractice and maladministration, this policy sets out how allegations are reported, investigated, and resolved in a consistent and proportionate manner.

You must familiarise yourself with this document and the related Sanctions Policy. These documents set the expectations for how our qualifications must be delivered and explain what action CTQ may take if these expectations are not met.

This policy supports CTQ's responsibilities to learners, centres, and our regulator (Ofqual), ensuring that the validity of our qualifications and the reputation of the wider qualifications system are upheld.

SCOPE

This policy covers actual, suspected, or potential incidents of malpractice or maladministration that could affect the development, delivery, assessment, or awarding of CTQ qualifications.

It applies to:

- All CTQ staff, contractors, and associates
- Members of the CTQ Governing Board and committees
- Approved centres and their staff delivering CTQ qualifications
- Any third parties acting on CTQ's behalf, including teachers and assessors

The policy defines **malpractice** as any deliberate act or omission that compromises, or has the potential to compromise, the integrity of CTQ's qualifications, assessments, or quality assurance processes.

It defines **maladministration** as accidental, negligent, or improper practices that result in non-compliance with CTQ's requirements or regulatory conditions.

Both malpractice and maladministration can undermine the validity of learner outcomes and CTQ's compliance with Ofqual's Conditions of Recognition and must be addressed with urgency and transparency.

ACTIVITY

CTQ is committed to preventing malpractice and maladministration wherever possible. However, when issues arise, we ensure that all allegations are investigated promptly, fairly, and proportionately to protect the integrity of our qualifications and the interests of learners.

Malpractice and maladministration can take many forms. A full list of common examples is included in Appendix 1: Examples of Malpractice and Maladministration.

REPORTING AN ALLEGATION

Anyone can report suspected malpractice or maladministration, including learners, CTQ staff or contractors, centre staff, or members of the public.

Reports must be made within 24 hours of the incident and submitted to CTQ by email to quality@ctq.org.uk.

Reports must include:

- Name and contact details of the reporting person
- Role of the reporting person (e.g. learner, centre manager)
- Name of the approved centre (if applicable)
- Details of individuals involved
- CTQ qualifications affected
- Dates, times, and description of the incident
- Any supporting evidence

Where the person making the allegation has a personal interest in the matter, this should also be declared. Anonymous reports are accepted, and whistle-blowers are protected by law. CTQ will take reasonable steps to maintain confidentiality, although anonymity cannot be guaranteed where legal or regulatory duties apply.

Where the allegation originates from centre staff, it is expected that the Head of Centre will be informed. CTQ will liaise with the Head of Centre unless there is a valid reason not to do so.

ALLEGATIONS OF MALPRACTICE OR MALADMINISTRATION

On receipt of a malpractice or maladministration allegation, CTQ undertakes a preliminary review to assess the validity of the information received and to determine whether a formal investigation is necessary. This review also considers any immediate actions required to contain or mitigate potential risks to learners, assessment processes, or regulatory compliance.

All valid reports will be acknowledged within two working days. The Head of Quality and Operations will lead the preliminary review, unless the allegation involves them directly, in which case a suitable alternative will be appointed. The scope and urgency of any investigation are shaped by:

- The seriousness of the allegation
- The number of learners, centres, or staff potentially implicated
- The risk of adverse effects, including regulatory non-compliance
- The security of assessment materials
- The involvement of CTQ staff or third-party contractors
- Whether external parties (e.g. other awarding organisations, learners, regulators) need to be informed

Where there is evidence of a potential Adverse Effect as defined by Ofqual, CTQ will notify the regulator and take steps to prevent further impact, including withholding results or delaying certification decisions where necessary.

RISK ASSESSMENT CRITERIA

CTQ applies a structured risk assessment to determine if a case is low or high risk. This helps ensure a proportionate and fair response while prioritising learner protection and compliance.

Examples of Low-Risk Indicators include:

- A small number of learners are affected
- The issue is contained to a single approved centre
- CTQ staff or third-party contractors are not involved
- Assessment materials have not been compromised
- There is no risk of regulatory breach or Adverse Effect
- The activity appears to be isolated or accidental
- No criminal activity is suspected

Examples of High-Risk Indicators include:

- Multiple learners, centres, or teachers are involved
- Confidential materials may have been compromised
- CTQ staff or contractors are implicated
- The allegation may result in an Adverse Effect under Ofqual Conditions
- The incident may constitute criminal behaviour (e.g. fraud, impersonation)
- There is a risk to CTQ's reputation, the qualification's validity, or public trust

Following the preliminary review and risk assessment, the CTQ will confirm whether a full investigation is required, and assign the appropriate level of oversight.

Low-risk cases are typically delegated to the approved centre's Head of Centre, who must carry out a structured investigation and report findings to CTQ. Additional guidance for centre investigations can be found in appendix 2 of this document.

High-risk cases are formally investigated by a CTQ member of staff or an associate with no personal interest in the outcome.

This approach ensures investigations are objective, robust, and free from bias. All investigators must have the appropriate competence, authority, and impartiality to determine the facts and assess the severity of any breach.

During an investigation CTQ may suspend registration, certification or withhold assessment outcomes for any learners potentially affected, pending the conclusion of the case.

INVESTIGATING MALPRACTICE

CTQ is committed to ensuring that all investigations are conducted fairly, reasonably, and in line with legal requirements. Investigations will be thorough, impartial, and consider all relevant information. Throughout the process, CTQ will engage primarily with the Head of Centre.

Before any investigation begins, CTQ will provide the Head of Centre with an investigation scope document along with CTQ's guidance for conducting investigations.

Investigations will seek to:

- Establish the facts surrounding the allegation and determine whether malpractice or maladministration has occurred
- Understand the circumstances and scale of the issue

- Identify the root cause and individuals involved
- Assess any risk posed to current learners and certification processes, and take steps to mitigate these
- Review any action already taken by the centre
- Decide if further remedial action is necessary to protect learners and the integrity of the qualification
- Determine whether certificates already issued require action
- Gather evidence to support any sanctions, following CTQ procedures
- Identify any patterns or trends indicating systemic issues
- Highlight any changes needed to CTQ or centre policies and procedures

Investigations must adhere to the following principles:

Confidentiality: all information collected is confidential and must be securely handled.

Disclosure is limited to authorised parties, such as Ofqual or the police, when appropriate.

Rights of Individuals: anyone suspected will be:

- Notified in writing of the allegation and supporting evidence
- Given the opportunity to respond in writing or seek advice
- Informed of potential consequences and that third parties (e.g. Ofqual, Police) may be notified
- Made aware of the appeals process
- Interviewed if required, with the right to be accompanied by a support person (for young persons or vulnerable adults, an appropriate adult must be present during interviews)
- Notified if legal advisors will be present during interviews

If the investigation is led by a CTQ member of staff or associate, it may include a visit to the centre, either pre-arranged or unannounced.

CTQ aims to complete investigations within 30 working days of receiving the allegation.

Where investigations require additional time, all involved parties will be informed of revised timelines.

The investigation process may include:

- Requests for additional information from CTQ staff, contractors, the centre, or other individuals
- Interviews conducted in person or by phone with staff, whistle-blowers, or learners
- Visits to the centre

Full cooperation from all involved parties is expected throughout the investigation.

OUTCOMES OF MALPRACTICE INVESTIGATIONS

Outcomes from Centre Investigations

When a centre completes its investigation, the full investigation report will be submitted to CTQ for a final decision. All conclusions and decisions will be strictly evidence-based.

At the decision stage, CTQ will aim to:

- Identify the specific CTQ rules or agreement clauses alleged to have been breached
- Consider the facts of the case
- Decide whether malpractice or maladministration has occurred
- Establish who is responsible
- Determine an appropriate level of remedial action or sanction

A proposed course of action will then be discussed between the approved centre and CTQ. This plan will address required improvements to policies, procedures, staff conduct, or resources. CTQ will monitor implementation to ensure completion.

If wrongdoing by the centre is confirmed, CTQ will act to:

- Minimise risk to the integrity of current and future qualifications
- Maintain public confidence in qualification delivery and awarding
- Ensure no unfair gain from compromised standards
- Notify Ofqual of the outcome where relevant

Any further action will be based on reasonable, evidence-supported judgments.

Sanctions will be applied according to CTQ's published Sanctions Policy. CTQ will inform the Head of Centre in writing of the final decision and reasoning. The Head of Centre must then communicate this to the individuals concerned. Failure to complete required actions may result in escalated sanctions.

The CTQ retains formal oversight of all investigations and outcomes.

Outcomes from CTQ Investigations

For investigations led directly by CTQ, the Head of Quality and Operations will usually decide the outcome. Serious or complex cases will be escalated to the Responsible officer.

If malpractice is confirmed, sanctions will be applied per the Sanctions Policy. The Leadership Team oversees these outcomes to ensure fairness and maintain standards.

CTQ will notify the centre in writing, detailing sanctions or remedial actions. The centre must communicate with affected parties. Failure to complete required actions may result in escalated sanctions.

If malpractice affects a learner's certificate or result, CTQ will revoke it accordingly.

Decisions will be evidence-based and aim to protect qualification integrity, public confidence, and ensure no unfair advantage.

Notifying the Outcome and Next Steps

CQT will formally notify the approved centre of the investigation outcome in writing. This will include:

- Details of the outcome
- Any sanctions applied or mitigation actions required
- Actions to be taken against centre staff or learners, if applicable

The Head of Centre is responsible for communicating the outcome to those involved.

If the action plan is not fully completed, the CTQ may recommend increased sanctions under the Sanctions Policy to protect learners.

If an investigation concludes that changes are needed within CTQ (for example, to policies, procedures, training, or quality controls), these will be formally recorded and actioned. The Responsible Officer will oversee the development of an improvement plan, with progress monitored by the Governing Board to ensure completion. This process ensures that lessons learned are embedded into CTQ's practices to prevent recurrence.

Appeals may be made per the CTQ Enquiries about Results and Appeals Policy.

ROLES AND RESPONSIBILITIES

The following RACI matrix outlines the roles and responsibilities for key activities within this policy, ensuring clarity on who is Responsible, Accountable, Consulted, and Informed.

Activity	Responsible	Accountable	Consulted	Informed
Identification of Potential Malpractice or Maladministration	All Staff, Contractors, Centres, and Learners	Head of Quality and Operations	Responsible Officer	Senior Leadership Team/Governing Board
Receipt and Logging of Allegation	Head of Quality and Operations	Head of Quality and Operations	Responsible Officer	Relevant Internal Teams
Initial Risk Assessment and Determination of Investigation Scope	Head of Quality and Operations	Head of Quality and Operations	Responsible Officer	Senior Leadership Team
Conducting the Investigation (Centre)	Centre's Head of Centre / Nominated Investigator	Head of Centre	Head of Quality and Operations	Relevant Learners / Staff
Conducting the Investigation (CTQ-led)	Head of Quality and Operations/ Appointed Investigator	Head of Quality and Operations	Responsible Officer	Head of Centre
Mitigating Actions (Centre-led)	Head of Centre	Head of Centre	Head of Quality and Operations	Centre Staff Involved
Mitigating Actions (CTQ-led)	Head of Quality and Operations	Head of Quality and Operations	Responsible Officer	Centre
Application of Sanctions	Head of Quality and Operations	Responsible Officer	Head of Centre	Centre Staff / Learners Affected
Outcome Notification to Centre	Head of Quality and Operations	Head of Quality and Operations	Responsible Officer	Head of Centre
Monitoring	Head of	Head of	Responsible	Senior

Implementation of Actions	Quality and Operations	Quality and Operations	Officer	Leadership Team
Escalation of Non-Compliance or Recurring Issues	Head of Quality and Operations	Responsible Officer	Governing Board	Leadership Team
Reporting to Ofqual or Other Awarding Organisations	Responsible Officer	Responsible Officer	Head of Quality and Operations	Governing Board
Policy and Procedure Review Following Confirmed Cases	Head of Quality and Operations	Head of Quality and Operations	Responsible Officer	Senior Leadership Team
Communication and Training on Policy	Head of Quality and Operations	Head of Quality and Operations	Responsible Officer	All Staff / Contractors / Centres

ESCALATION AND REPORTING

If allegations of malpractice or maladministration involve CTQ staff, contractors, consultants, the Responsible Officer, or a Board member, the matter will be escalated to the Governing Board.

The Board's role is to review serious cases, agree on any actions needed to protect the integrity and standards of our qualifications, and decide on next steps. This may include disciplinary action or changes to contractual arrangements, following CTQ's internal policies.

CTQ will promptly notify Ofqual of any malpractice or maladministration investigations that may affect learners or the integrity of qualifications.

If certificates or results are found invalid, CTQ will inform the centre, learners, and Ofqual, and provide a plan for reassessment or re-certification.

MALPRACTICE REVIEW AND REPORTING

All allegations and confirmed cases of malpractice and maladministration within CTQ are logged systematically and reviewed regularly to identify any recurring patterns, risks to qualification quality, and areas needing improvement. This ongoing process supports CTQ's commitment to regulatory compliance and continuous organisational learning.

We assess the nature, frequency, and outcomes of malpractice incidents to determine if they reveal weaknesses in our systems, controls, or delivery processes that could undermine the integrity of our qualifications and assessments.

Insights gained from these reviews inform necessary updates to policies, procedures, staff training, and quality assurance activities. CTQ is committed to taking proportionate and preventative actions to reduce the likelihood of malpractice recurring and to maintain trust in our awarding activities.

Summary reports on malpractice are provided to the Senior Leadership Team and reviewed alongside other quality and compliance indicators. Serious or repeated issues are escalated to the Board for governance oversight.

POLICY REVIEW

This policy is subject to a three-year review cycle, or earlier if feedback or concerns are raised with CTQ, to ensure it remains fit for purpose and its processes and outcomes are deliverable.

It will also be reviewed as part of CTQ's continuous improvement monitoring through its annual self-assessment arrangements.

REGULATORY CONDITIONS AND REQUIREMENTS

CTQ is committed to meeting the requirements set out by Ofqual's Conditions of Recognition.

CTQ will ensure:

- Policies and procedures align with regulatory conditions.
- All staff understand their obligations in relation to compliance.
- A robust system is in place to identify, manage, and mitigate risks to regulatory compliance.

The table below lists the conditions to which this policy applies.

Condition reference							
A4.5	A8.1	A8.2	A8.3	A8.4	A8.5	A8.6	A8.7
A6.2	D3.1	A5.2					

APPENDIX 1 – EXAMPLE OF MALPRACTICE AND MALADMINISTRATION

The below table shows example of malpractice and maladministration , this table is not exhaustive and will be kept under review to ensure any new currently unknow incidents are added to this policy.

The possible sanctions outlined below are indicative only. All incidents are assessed on a case-by-case basis, taking into account the nature and scale of the incident, any previous concerns, and the risk posed to CTQ, the qualification, and learners. Sanctions may vary depending on the severity and context.

Type	Description	Risk	Possible Sanction
Malpractice	Tampering with assessment evidence	High	Suspension of certification and investigation
Malpractice	Falsification or manufacturing of records/evidence	High	Learner/centre disqualification, certification void
Malpractice	Bribery	High	Centre approval withdrawal, legal referral
Malpractice	Improper assistance during assessments	Medium-High	Assessment void, staff suspension
Malpractice	Conflict of interest compromising assessment	Medium-High	Staff suspension, investigation
Malpractice	Failure to report suspected malpractice	Medium	Warning or sanction escalation depending on severity
Malpractice	Failure to cooperate with CTQ investigation	Medium	Centre suspension or sanction escalation
Malpractice	Learner collusion	Medium	Assessment void, learner disqualification
Malpractice	Denial of access to CTQ/regulatory authorities	High	Centre suspension or approval withdrawal
Malpractice	Fraudulent certificate claims	High	Certificate revocation, centre sanction
Malpractice	Breach of assessment material confidentiality	High	Assessment redesign, staff suspension

Malpractice	False access arrangement requests	Medium	Centre warning or staff sanction
Malpractice	Alteration of results or certificates	High	Withdrawal of approval, permanent disqualification
Malpractice	Impersonating a learner	High	Disqualification, police involvement
Malpractice	Withholding critical information	Medium	Staff suspension, centre warning
Malpractice	Destruction of learner work	Medium-High	Learner/staff suspension, certification void
Malpractice	Refusal to engage with CTQ communication	Medium	Sanction escalation, possible suspension
Maladministration	Inappropriate retention or destruction of records	Medium	Centre action plan, monitoring, warning
Maladministration	Failure to ensure appropriate assessment conditions	Medium	Re-assessment at centre's cost, staff retraining
Maladministration	Poor administration (e.g. failure to keep accurate records)	Low-Medium	Recommendation for training, internal audit
Maladministration	Registering a learner after the assessment has taken place	Medium	Assessment voided, centre warning
Maladministration	Inappropriate sharing of CTQ system passwords	Medium	IT access restrictions, staff suspension
Maladministration	Giving unauthorised assistance with reasonable adjustments	Medium	Staff suspension, potential re-assessment
Maladministration	Unintentional conflict of interest	Low-Medium	Declaration and controls update, training or oversight imposed

APPENDIX 2 CENTRE INVESTIGATION GUIDANCE

This guidance supports the implementation of CTQ's Malpractice and Maladministration Policy and must be followed when a centre is permitted to conduct a local investigation into an allegation of malpractice or maladministration. It is intended to ensure consistency, fairness, and regulatory compliance across all CTQ-approved centres.

Where an approved centre is asked to carry out its own investigation, any associated costs will not be reimbursed by CTQ.

Important: CTQ remains fully responsible for all malpractice investigations, even where a centre-led investigation is permitted. CTQ alone determines whether a case is suitable for centre investigation and retains the right to withdraw permission or take over the investigation at any stage. Centres are expected to cooperate fully throughout the process.

WHEN A CENTRE-LED INVESTIGATION MAY BE PERMITTED

Following an initial review and structured risk assessment, CTQ may delegate the investigation of a malpractice or maladministration allegation to the centre's Head of Centre. This is only considered in cases assessed as low risk, where:

- The incident appears to be isolated and not systemic
- Only a small number of learners or staff are affected
- There is no evidence of criminal behaviour or regulatory breach
- Assessment security has not been compromised
- CTQ staff, contractors, or awarding partners are not involved

Where a centre-led investigation is agreed, CTQ will issue a written notification along with an investigation scope and timeline. Centres must not commence investigations unless CTQ has granted explicit permission.

PURPOSE OF A CENTRE INVESTIGATION

The objective of the investigation is to establish, through robust evidence:

- Whether malpractice or maladministration occurred
- Who was involved and to what extent
- The root cause and any contributing factors
- The potential impact on learners, assessments, or results
- Whether certificates or results are affected
- What corrective actions are needed to prevent recurrence

This must be done in a manner that protects the integrity of CTQ qualifications and maintains public and regulatory confidence.

ROLES AND RESPONSIBILITIES

When authorised, the Head of Centre is accountable for conducting or overseeing the investigation. This includes:

- Ensuring that the process is timely, thorough, and impartial
- Delegating only to suitably senior staff without conflict of interest
- Personally approving the final investigation report
- Ensuring that all staff and learners involved are treated fairly
- Cooperating fully with CTQ requests for evidence or clarification

Note: Investigations must not be carried out by individuals involved in the incident or who have a vested interest in the outcome.

CTQ retains the right to:

- Review the progress of the investigation at any point
- Request additional evidence or clarification
- Reassign the case to an internal CTQ investigator if concerns arise about impartiality, quality, or timeliness

FAIR TREATMENT AND INDIVIDUAL RIGHTS

Centres must ensure that all individuals implicated in the allegation are:

- Informed in writing of the nature of the allegation and the supporting evidence
- Given the opportunity to respond and provide a written statement
- Treated fairly and without prejudice, regardless of their role or seniority
- Offered support or representation in line with the Centre's own disciplinary or grievance procedures
- Made aware of potential outcomes and their right to appeal
- Supported appropriately if they are under 18 or considered a vulnerable adult

This process should be handled sensitively and confidentially, with clear communication at each stage. Any interviews must follow the centre's standard investigation or disciplinary procedures.

INVESTIGATION STANDARDS AND EVIDENCE GATHERING

Investigations must be conducted objectively and consistently, with full documentation of all steps taken. The following should be included where applicable:

- Factual timeline of the incident and key events
- Interviews with involved parties (or written statements where interviews are not feasible)
- Supporting documents, such as:
 - Assessment records, invigilation logs, internal quality assurance notes
 - Learner work in question (including examples of suspected plagiarism)
 - Seating plans (for exam settings)
 - Evidence of guidance or instructions given to staff and learners
 - Copies of policies or procedures referenced in the investigation
 - Written statements from staff on headed paper
 - Employer statements (if applicable)
 - Any relevant contextual or mitigating evidence (e.g., medical letters)

Centres must take care to gather balanced, factual evidence, and avoid drawing conclusions before all relevant information has been reviewed.

COMPLETING AND SUBMITTING THE INVESTIGATION REPORT

A final investigation report must be submitted to CTQ within **10 working days** of approval to proceed, unless an extension has been agreed in writing. The report must:

- Clearly summarise the allegation, process, findings, and conclusions
- Identify whether malpractice or maladministration occurred
- Name those involved and their roles
- Evaluate the scale and impact of the issue
- Propose appropriate corrective or remedial actions
- Be accompanied by all supporting evidence, indexed where possible

CTQ may return the report for clarification or further evidence if it does not meet the required standard or if questions remain unanswered.

OUTCOME

Once the centre submits the report, CTQ will:

- Review all documentation and decide whether the findings are sufficient and reliable
- Confirm the final outcome of the case, including whether malpractice or maladministration has occurred
- Determine what, if any, sanctions or remedial actions are required
- Notify the centre in writing of CTQ's final decision

CTQ will issue an action plan where necessary, and the centre will be expected to complete all actions within the agreed timeframe. Ongoing monitoring may be put in place.

If CTQ finds that the centre-led investigation was incomplete, flawed, or lacked independence, it may:

- Reopen the investigation under CTQ control
- Escalate the case and apply further sanctions
- Review the centre's approval status

RETENTION AND CONFIDENTIALITY

All investigation documentation must be retained securely by the centre for **at least 3 years**. Materials must be treated as confidential and only shared with individuals authorised by CTQ or a regulatory body.

SUPPORT AND CLARIFICATION

Centres who are unsure how to proceed, or who require advice before submitting a report, should contact the CTQ Quality Team via quality@ctq.org.uk. Advice can be given on structure, scope, or specific evidentiary requirements.