

Malpractice, Maladministration and Sanctions Policy

A2A Qualifications Limited

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Supersedes	All previous A2A Training malpractice, maladministration and sanctions policies and procedures.
Applies to	A2A personnel, assessors and internal quality assurers; approved centres, training providers and employers; apprentices and learners; and any contracted third parties involved in assessment.

1. Purpose and scope

A2A Qualifications Limited (“A2A”) is committed to the integrity, validity, fairness and security of its assessment. This policy sets out how A2A prevents, identifies, investigates and responds to malpractice and maladministration, and the sanctions that may follow. It applies to all apprenticeship assessment and to any regulated qualification activity A2A delivers.

A2A operates a centre-network model offering centre-assessed, partially centre-assessed and fully A2A-assessed delivery. **Whichever model applies, A2A retains responsibility for moderation and for certification, and therefore for the integrity of the assessment outcome.** This policy applies to A2A personnel, assessors and internal quality assurers; approved centres, training providers and employers; apprentices and learners; and any contracted third parties involved in assessment.

2. Regulatory and policy context

A2A’s assessment is governed first by two sources: the published **assessment plan** for each apprenticeship standard, and **Ofqual’s recognition requirements** set out in the General Conditions of Recognition and associated guidance — including the Condition on malpractice and maladministration. The applicable assessment plan is the version relating to the apprentice’s start date, not necessarily the current version.

Precedence. A2A maintains its own internal policies and procedures, including this one. Where any A2A policy or procedure differs from the applicable assessment plan or Ofqual’s requirements, the assessment plan and Ofqual’s requirements take precedence.

For context, the occupational standards and assessment plans are owned by Skills England (which took over the former IfATE’s functions on 1 June 2025); A2A is listed on the Apprenticeship Provider and

Assessment Register (APAR) and is subject to external quality assurance; and responsibility for apprenticeships policy moved to the Department for Work and Pensions in September 2025. A2A handles personal data under the UK GDPR and the Data Protection Act 2018.

3. Definitions

Malpractice is any deliberate act, default or practice that compromises, or could compromise, the integrity, validity or security of assessment, the authenticity of evidence, or the reputation and credibility of A2A or its qualifications. It includes attempts to do so and assisting others.

Maladministration is any activity, negligence, default or other practice that breaches A2A's requirements or regulatory requirements, typically arising from a failure to follow process, weak administration or lack of attention, whether or not it was intended.

In broad terms, malpractice usually involves intent or recklessness, while maladministration often arises from error or weak processes. Both can carry sanctions and both must be addressed. The examples below are indicative and not exhaustive.

By apprentices and learners

- Plagiarism, collusion, or submitting work that is not the apprentice's own.
- Fabricating, falsifying or improperly altering evidence.
- Impersonation, or arranging for another person to undertake assessment.
- Misrepresenting AI-generated content as the apprentice's own work (see section 4).
- Bringing unauthorised material or devices into a controlled assessment, or breaching assessment conditions.
- Including offensive, discriminatory or obscene material in assessment evidence, or behaving disruptively during an assessment.

By centres, training providers and employers

- Falsifying or improperly influencing evidence or witness testimony.
- Coaching, completing or unduly assisting an apprentice's assessed work.
- Putting apprentices through gateway without meeting the gateway requirements.
- Failing to declare or manage a conflict of interest, or misusing A2A documentation or branding.
- Failing to keep required records, or obstructing or failing to support an investigation.

By A2A personnel, assessors and internal quality assurers

- Failing to assess to the standard or assessment plan, or applying inconsistent judgement.
- Bias, or an undeclared conflict of interest.
- Breaching confidentiality or assessment security.
- Inaccurate, incomplete or falsified recording of assessment decisions, or failing to follow A2A processes.

4. Use of artificial intelligence in assessment

A2A recognises that artificial intelligence tools, including generative AI, are widely available and can have legitimate uses in learning and preparation. Their use is not prohibited in itself. What matters is the authenticity of the evidence on which an assessment decision is based.

It is malpractice where AI is used in a way that misrepresents an apprentice's own knowledge, skills and behaviours — for example, submitting AI-generated material as the apprentice's own work, any use that undermines the integrity or authenticity of assessment evidence, or any use that breaches the conditions of a particular assessment method (such as a controlled assessment, test or professional discussion).

Apprentices remain responsible for the authenticity of everything they submit and may be required to confirm it through an authenticity declaration and to demonstrate their understanding directly, for example through professional discussion or questioning. A2A uses a range of authentication measures — assessor and internal quality assurer professional judgement, knowledge of the apprentice's work over time, oral questioning and consistency checks. Any AI-detection tools are treated as one indicative signal only and are never relied on as conclusive proof on their own. Where AI misuse is suspected, the matter is handled under this policy.

Individual assessment plans may set their own rules on permitted tools and resources. Where they do, the plan applicable to the apprentice's start date takes precedence over this general statement.

5. Roles and responsibilities

A2A retains overall responsibility for the integrity of assessment, and for moderation and certification, in every delivery model. Specific responsibilities are:

- **Responsible Officer** – accountable for this policy, for regulatory notifications, and for sanction decisions at organisation level.
- **Assessors and internal quality assurers** – identify, record and report suspected malpractice or maladministration. The named assessor remains the accountable decision-maker on assessment judgements.
- **Centres, training providers and employers** – maintain their own arrangements to prevent and detect malpractice, cooperate fully with investigations, and notify A2A without delay of any suspected malpractice or maladministration. This duty bears most directly where assessment is centre-assessed or partially centre-assessed; A2A's moderation and certification responsibility is retained in every model.
- **Apprentices and learners** – act honestly, follow assessment conditions, and confirm the authenticity of their work.

Everyone covered by this policy has a duty to report concerns. Good-faith reports are protected from detriment under A2A's whistleblowing arrangements.

6. Preventing malpractice and maladministration

A2A reduces the risk of malpractice and maladministration through clear induction and information for centres and apprentices; authenticity declarations; standardisation and internal quality assurance sampling; secure handling of assessment materials and results; management of conflicts of interest; robust record keeping; and ongoing monitoring of centres appropriate to the delivery model in use. Malpractice or maladministration may come to light through this monitoring and quality assurance,

through complaints or feedback, through a whistleblower, or through intelligence shared by another organisation, including another awarding or assessment organisation.

7. Raising and reporting a concern

Anyone may raise a concern about suspected malpractice or maladministration. Concerns should be reported promptly, in writing where possible, to A2A at info@a2aqualifications.co.uk, setting out what is alleged, who is involved, and any supporting information. Concerns may be raised in confidence, and good-faith reporters are protected from detriment.

Centres, training providers and employers must notify A2A without delay of any suspected malpractice or maladministration affecting A2A assessment. Where A2A believes that an event has occurred, or is likely to occur, that could have an adverse effect — including a suspected incident that could invalidate an end-point assessment result — A2A will promptly notify Ofqual in line with its regulatory notification obligations, and will not delay notifying Ofqual because information is incomplete. A2A will also notify Skills England or another relevant authority where required, and will involve the police where criminal conduct is suspected.

Where a matter may affect another end-point assessment organisation — for example because it concerns shared evidence, a shared centre, or an individual involved in assessment elsewhere — A2A will inform that organisation, and will share information or undertake a joint investigation where appropriate and permitted, in line with its regulatory obligations.

8. Investigation

A2A investigates reported concerns in a way that is proportionate, fair, confidential and free from conflict of interest. An investigation is normally led by the Compliance Manager; where the concern involves the Compliance Manager, it is led by the Director or an independent internal quality assurer, so that no one investigates a matter in which they have a personal interest. Depending on the severity and where assessment is centre-assessed, A2A may ask a centre to carry out an initial investigation and provide a full report, but A2A remains responsible for the conclusion. Those involved are informed of the allegation and given the opportunity to respond, unless doing so would prejudice the investigation or a regulatory or criminal matter. Indicative timescales are:

- Acknowledgement of a report within 5 working days.
- Investigation normally concluded within 20 working days; where a case is complex, this may be extended, with notification to those involved, to a maximum of 40 working days.
- Interim measures may be applied pending the outcome — for example withholding results or certificates, or suspending an activity — where this is necessary to protect assessment integrity.
- The outcome is confirmed in writing, with reasons.

These timescales align with the Enquiries, Appeals and Complaints Policy (A2A-EAC-POL-001) so that the published ladder is consistent across A2A's policy suite.

9. Outcomes and sanctions

Sanctions are proportionate to the seriousness, intent and impact of the matter, and aim both to protect the integrity of assessment and to put things right. A single matter may attract more than one sanction. Decisions affecting an apprentice's assessment outcome are made by A2A as the awarding

organisation, on the evidence, following investigation; the named assessor remains the accountable decision-maker on the underlying assessment judgement.

Subject	Examples of possible sanctions (proportionate to seriousness, intent and impact)
Apprentices and learners	<ul style="list-style-type: none"> - Written warning recorded on file. - Requirement to redo or resubmit affected work under controlled conditions. - Disallowing or voiding affected evidence or results. - Declaring a result void and requiring reassessment. - Barring from reassessment for a defined period in serious or repeated cases.
Centres, training providers and employers	<ul style="list-style-type: none"> - Action plan with timescales and follow-up monitoring. - Increased monitoring, sampling or additional moderation, which may be at the centre's cost. - Suspension of registrations, gateway submissions or certification claims. - Withdrawal of centre approval or registration. - Recovery or invalidation of certificates already issued. - Referral to the funding body, Skills England and/or Ofqual, and recovery of fees where appropriate.
A2A personnel, assessors and internal quality assurers	<ul style="list-style-type: none"> - Removal from specific assessment activity. - Required retraining and standardisation. - Suspension from assessment duties pending or following investigation. - Disciplinary action under A2A's HR procedures. - Referral to relevant professional or membership bodies.

10. Appeals against a decision or sanction

A decision or sanction made under this policy may be appealed under the Enquiries, Appeals and Complaints Policy (A2A-EAC-POL-001). In summary, an appeal must be lodged within 10 working days; the staged turnaround is 5, 10 and 20 working days, extendable to a maximum of 40 working days for complex cases; there is an independent review stage, with subsequent escalation to Ofqual. A fee of £400 applies to grade or outcome appeals and is refunded if the outcome changes in the appellant's favour. On review, a grade can go down as well as up.

11. Records, confidentiality and data protection

Records relating to malpractice, maladministration and sanctions are kept securely for the required retention period and handled under the UK GDPR and the Data Protection Act 2018. They are shared only with those who need them, and with regulators where required.

Special-category personal data (for example health, disability or safeguarding information) is handled only where an appropriate lawful basis under UK GDPR Article 9 applies, and such matters are referred

internally for data protection sign-off before they are processed. See the Data Protection / Privacy Policy.

12. Related documents

- Enquiries, Appeals and Complaints Policy (A2A-EAC-POL-001)
- Conflict of Interest and Whistleblowing Policy (A2A-CIW-POL-003)
- Reasonable Adjustments and Special Considerations Policy
- Data Protection / Privacy Policy
- Centre Assessment Standards Scrutiny (CASS) Policy
- AI in Apprenticeship Assessment Policy

13. Version history

Version	Date	Owner	Summary of change
1.0	10 June 2026	Director	New clustered policy. Replaces legacy A2A Training malpractice, maladministration and sanctions content. Updated to A2A Qualifications identity and CASS model; terminology aligned (apprenticeship assessment / awarding organisation); AI content rewritten; regulatory references updated to Skills England, APAR, UK GDPR and the Data Protection Act 2018; timescales aligned to the appeals and complaints ladder.
1.1	10 June 2026	Director	Notification section strengthened to reflect sector practice: explicit duty to notify other affected end-point assessment organisations and to share information or undertake joint investigation where appropriate; regulator notification anchored to the adverse-effect duty, with prompt notification to Ofqual that will not be delayed for incomplete information.
1.2	10 June 2026	Director	Benchmarked against sector policy. Apprentice malpractice examples expanded (unauthorised devices; offensive or disruptive conduct); added how malpractice and maladministration come to light (monitoring, complaints, whistleblowing, intelligence from other organisations); investigation lead made explicit (Compliance Manager, or Director where conflicted) with provision for an initial centre investigation while A2A retains the conclusion.