Malpractice and Maladministration Policy	
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Policy prepared by	Director of Quality, Compliance & Excellence
Approved by	Educationwise Board
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Policy statement

Educationwise is committed to protecting the integrity, validity, reliability and security of its assessments, qualifications and apprenticeship assessment arrangements.

Educationwise will take reasonable and proportionate steps to:

- Prevent malpractice and maladministration
- Explain assessment requirements clearly
- Protect confidential assessment materials
- Confirm the authenticity of learner work
- Identify and report concerns promptly
- Conduct fair and evidence-based investigations
- Cooperate with Awarding Organisations, Assessment Organisations and End-Point Assessment Organisations
- Protect learners from unfair or unsupported decisions
- Apply appropriate corrective action
- Learn from incidents and strengthen controls

Educationwise will not ignore suspected malpractice or maladministration because reporting it may affect performance information, learner outcomes, funding, centre approval or organisational reputation.

Purpose

The purpose of this policy is to explain:

- What malpractice and maladministration mean
- The responsibilities of learners, staff and third parties
- How Educationwise seeks to prevent incidents
- How artificial intelligence may and may not be used
- How concerns should be reported
- How allegations will be assessed and investigated
- When an external organisation must be informed
- What outcomes and corrective actions may apply
- How decisions may be appealed
- How incidents and lessons will be recorded and monitored

Scope

This policy applies to:

- Apprentices
- Learners enrolled on Adult Learning Provision
- Commercial-course learners
- Prospective learners where an allegation relates to application, eligibility or prior evidence
- Employees
- Tutors and assessors
- Internal quality assurers
- Invigilators
- Programme Coordination and MIS staff
- Managers and senior leaders
- Associates and contractors
- Subcontractors and their staff
- Employers and workplace mentors where they contribute evidence
- Witnesses
- Any person acting for or on behalf of Educationwise

For this policy, **Adult Learning Provision** includes programmes currently funded through Advanced Learner Loans and any future adult education funding streams delivered by Educationwise.

The policy applies to:

- Teaching and learning
- Internal assessment
- Examinations
- Controlled assessments
- Practical assessments
- Portfolio evidence
- Recognition of prior learning
- Internal quality assurance
- Registrations

- Reasonable adjustments
- Certification
- Learner and funding records
- Apprenticeship assessment arrangements
- Assessment materials
- Online platforms
- Artificial intelligence
- Direct and subcontracted delivery

External requirements

Educationwise will follow:

- The current requirements of the relevant Awarding Organisation
- The requirements of the relevant apprenticeship Assessment Organisation or End-Point Assessment Organisation
- Relevant qualification specifications and assessment strategies
- Joint Council for Qualifications requirements where applicable
- Applicable funding and contractual requirements
- Educationwise's approved-centre responsibilities

Awarding Organisations regulated by Ofqual must maintain arrangements to prevent, investigate and take action in relation to malpractice and maladministration. Educationwise supports those obligations as an approved centre by following the instructions and reporting routes provided by each Awarding Organisation.

Where this policy differs from a current Awarding Organisation, Assessment Organisation or EPAO instruction, the external organisation's requirement will take priority.

Educationwise must not begin, conclude or communicate the outcome of an investigation where doing so would conflict with an external organisation's instructions.

Definitions

Malpractice

Malpractice is an act, omission or practice that:

- Breaches assessment or qualification requirements
- Gives or could give an unfair advantage
- Disadvantages or could disadvantage another learner

- Compromises assessment validity or security
- Undermines the reliability of a result
- Misrepresents achievement
- Damages public confidence in a qualification or assessment

Malpractice may involve a learner, employee, assessor, invigilator, subcontractor, employer or another person.

Malpractice may be deliberate or may arise through reckless or seriously improper conduct.

Maladministration

Maladministration is a failure to follow required administrative, quality-assurance or assessment processes.

It may arise through:

- Carelessness
- Poor organisation
- Inadequate training
- Weak controls
- Repeated errors
- Wilful non-compliance
- Failure to act after a problem is identified

A genuine isolated mistake may initially be treated as an administrative error. However, repeated, serious or concealed errors may amount to maladministration or malpractice.

Academic misconduct

Academic misconduct is learner behaviour that misrepresents the originality, authenticity or standard of assessed work.

It may include plagiarism, collusion, cheating, contract cheating, fabrication or inappropriate use of artificial intelligence.

Artificial intelligence

Artificial intelligence includes digital tools capable of generating, revising, summarising, translating or analysing content such as:

- Text
- Images
- Audio

- Video
- Data
- Code
- Presentations
- Assessment responses

Adverse effect

An adverse effect is an incident or circumstance that could disadvantage learners, invalidate an assessment, affect standards or damage confidence in a qualification.

Suspected malpractice

Suspected malpractice means that there is a concern supported by some information or evidence, but no final finding has been made.

An allegation must not be presented as proven before the investigation is complete.

General principles

Fairness

Decisions will be based on relevant evidence and the individual will normally have an opportunity to respond.

Impartiality

No person will investigate or make a final decision where they:

- Are directly involved in the allegation
- Made the original decision under review
- Are the subject of the concern
- Have an unmanaged conflict of interest

Proportionality

The response will reflect:

- The seriousness of the concern
- The evidence available
- The possible impact
- Whether the conduct was deliberate
- Whether it is repeated
- The requirements of the relevant external organisation

Confidentiality

Information will only be shared with people who need it to:

- Protect assessment integrity
- Conduct a fair investigation
- Make a decision
- Protect learners or staff
- Meet a reporting requirement

Absolute confidentiality cannot always be guaranteed.

Non-retaliation

No person will be disadvantaged for raising a genuine concern in good faith.

Preservation of evidence

Relevant evidence must not be altered, deleted, destroyed or concealed after a concern has been raised.

External authority

Educationwise will only make decisions within its authority.

An Awarding Organisation, Assessment Organisation or EPAO may make the final decision about:

- Assessment validity
- Marks or grades
- Certification
- Disqualification
- Centre approval
- Assessment staff approval

Examples of learner malpractice

Learner malpractice may include:

- Plagiarism
- Collusion
- Copying another learner's work
- Allowing another person to copy work
- Contract cheating

- Impersonation
- Asking another person to complete work
- Fabricating evidence
- Forging signatures
- Falsifying dates, attendance or workplace activity
- Submitting false witness testimony
- Inventing workplace examples or reflective accounts
- Using unauthorised notes, websites or devices
- Obtaining confidential assessment materials
- Sharing assessment materials improperly
- Breaching examination conditions
- Communicating with another learner during controlled assessment
- Submitting the same work improperly for more than one assessment
- Providing false prior-learning evidence
- Using artificial intelligence contrary to assessment rules
- Failing to declare permitted AI use where declaration is required
- Submitting AI-generated work that does not represent the learner's own knowledge or skills
- Attempting to influence an assessor improperly
- Interfering with another learner's work

This list is not exhaustive.

Examples of staff or centre malpractice

Staff or centre malpractice may include:

- Giving assistance beyond that permitted
- Writing or substantially rewriting a learner's assessed work
- Providing assessment answers
- Coaching a learner during an examination or controlled assessment
- Changing learner work after submission
- Fabricating assessment evidence
- Fabricating IQA or witness records

- Altering assessment dates
- Falsifying signatures
- Claiming achievement without sufficient evidence
- Ignoring known plagiarism or malpractice
- Allowing an unmanaged conflict of interest
- Sharing confidential assessment materials
- Failing to maintain examination security
- Permitting unauthorised materials or technology
- Applying assessment criteria inconsistently for an improper reason
- Pressuring staff to pass learners without evidence
- Making inaccurate registrations or certificate claims deliberately
- Submitting false information to an Awarding Organisation
- Concealing an incident
- Obstructing an investigation
- Destroying relevant evidence
- Allowing performance or funding pressure to influence assessment decisions
- Using artificial intelligence as the sole means of making an assessment decision

Current JCQ procedures identify security breaches, fabricated assessment records, improper assistance, weak examination controls and failure to prevent AI misuse as potential centre or staff malpractice.

Examples of maladministration

Maladministration may include:

- Late or inaccurate registrations
- Incorrect learner details
- Incorrect qualification or component entries
- Certification claims made through error
- Poor record keeping
- Failure to retain required evidence
- Insecure storage
- Failure to follow assessment timelines

- Failure to arrange approved reasonable adjustments
- Use of an incorrect assessment task
- Failure to complete required IQA activity
- Inadequate invigilator training
- Failure to act on an identified conflict
- Inaccurate reporting to an Awarding Organisation
- Repeated failure to follow internal processes
- Failure to implement agreed corrective action
- Subcontractor records not being monitored adequately
- Failure to update learner or assessment status accurately

Responsibilities

Chief Executive Officer

The Chief Executive Officer has overall executive accountability for ensuring suitable malpractice and maladministration arrangements are in place.

The Chief Executive Officer will:

- Support independent investigation
- Ensure suitable resources are available
- Consider serious staff or organisational allegations
- Approve significant corrective action
- Ensure serious matters are escalated to the Board where required

Director of Quality and Compliance

The Director of Quality and Compliance will:

- Oversee implementation of this policy
- Maintain oversight of allegations and investigations
- Determine the initial reporting route
- Liaise with external organisations
- Appoint an appropriate investigator
- Monitor timescales
- Ensure actions are completed
- Review trends and controls

- Escalate significant risks

Where the Director of Quality and Compliance is directly involved in an allegation, the Chief Executive Officer or another suitably independent person will manage the process.

Quality and Compliance Team

The Quality and Compliance Team will:

- Maintain the incident log
- Preserve relevant records
- Support initial reviews and investigations
- Monitor Awarding Organisation notifications
- Track actions and deadlines
- Review themes
- Inform IQA and quality-improvement activity
- Escalate risks through the relevant governance arrangements

Internal quality assurers

Internal quality assurers will:

- Monitor assessment quality and authenticity
- Identify unusual or inconsistent evidence
- Check assessor decisions
- Review conflicts of interest
- Report concerns promptly
- Support investigations where independent
- Increase sampling where risk requires it
- Avoid making findings outside their authority

Tutors and assessors

Tutors and assessors must:

- Explain assessment and AI requirements clearly
- Ensure learners understand authenticity expectations
- Apply assessment criteria consistently
- Provide only permitted support
- Maintain accurate records

- Protect assessment materials
- Declare conflicts
- Report concerns promptly
- Avoid making an allegation directly to a learner before taking advice where external reporting may be required
- Cooperate with investigations

Programme Coordination and MIS teams

Programme Coordination and MIS staff must:

- Complete registrations accurately
- Maintain learner and qualification records
- Follow certification requirements
- Protect assessment and learner information
- Report errors promptly
- Correct records where authorised
- Maintain suitable audit evidence
- Cooperate with external checks and investigations

Invigilators

Invigilators must:

- Follow the Examination Policy
- Maintain assessment conditions
- Prevent unauthorised communication
- Record incidents accurately
- Protect materials
- Report suspected malpractice immediately
- Avoid confronting or investigating beyond their role

Subcontractors

Subcontractors must:

- Follow this policy
- Follow all relevant external requirements
- Report suspected incidents immediately

- Protect evidence
- Avoid conducting an unauthorised investigation
- Cooperate fully with Educationwise and external organisations
- Implement corrective actions

Educationwise retains oversight responsibility for subcontracted provision.

Employers and workplace witnesses

Employers and workplace witnesses must:

- Provide accurate information
- Only confirm activity they have observed or can verify
- Avoid completing assessed work for the learner
- Avoid giving false witness testimony
- Report concerns about authenticity
- Cooperate with reasonable enquiries

Learners

Learners must:

- Submit their own work
- Follow assessment instructions
- Acknowledge sources
- Declare permitted AI use
- Keep evidence and assessment materials secure
- Provide accurate information
- Attend authenticity discussions where reasonably required
- Cooperate with investigations
- Avoid interfering with evidence or other people involved

Preventative controls

Educationwise will use proportionate controls including:

- Clear assessment briefs
- Learner induction
- Authenticity declarations

- AI guidance
- Examination and controlled-assessment instructions
- Staff training
- Assessor and IQA standardisation
- Risk-based IQA sampling
- Conflict-of-interest declarations
- Secure storage
- Restricted system access
- Version histories and audit trails
- Learner questioning
- Observation of practical competence
- Review of prior learning
- Subcontractor monitoring
- Accurate registration and certification controls
- Separation of duties where appropriate
- Review of unusual trends or results

Educationwise will not rely solely on a signed declaration where other evidence raises a concern about authenticity.

Artificial intelligence and assessment

Assessment-specific requirements

Artificial intelligence may only be used in assessed work where:

- The assessment instructions permit it
- The relevant external organisation permits it
- The learner remains responsible for the final work
- The use does not prevent valid assessment of the learner
- Required acknowledgement or declaration is completed

Rules may differ between qualifications, units, tasks and assessment methods.

Learners must check the instructions for each assessment.

JCQ guidance confirms that AI cannot be used in examinations or other assessments governed by examination conditions. It may be permitted in some other assessments, but learners must follow the specific instructions and acknowledge its use where required.

Permitted use

Where permitted, AI may support activities such as:

- Generating initial ideas
- Exploring possible structures
- Supporting research
- Summarising information for study
- Checking spelling or grammar
- Supporting formative learning
- Creating practice questions
- Helping a learner understand a topic

Use is only acceptable where the learner:

- Critically reviews the output
- Checks accuracy
- Uses reliable sources
- Produces the assessed response themselves
- Can explain and justify their work
- Acknowledges the tool and its use where required
- Retains supporting evidence where requested

AI declaration

Where AI has been used in assessed work, the learner may be required to state:

- The name of the tool
- The date it was used
- How it was used
- Which part of the work it supported
- How the output was checked or changed

A suitable declaration is:

I used [name of AI tool] on [date] to support [brief description]. I reviewed and edited the output and confirm that the submitted work reflects my own knowledge and understanding.

A declaration does not automatically make the use acceptable. The use must still comply with the assessment rules.

Prohibited use

Unless expressly permitted by the relevant assessment instructions, learners must not use AI to:

- Produce examination answers
- Produce controlled-assessment responses
- Generate complete or substantial assessed answers
- Produce reflective accounts as if based on personal experience
- Generate workplace evidence
- Fabricate examples, observations or data
- Produce witness statements
- Generate professional-discussion answers
- Falsify references or sources
- Translate work where language competence is being assessed
- Bypass the intended learning
- Misrepresent authorship
- Create work the learner cannot explain
- Change evidence after observation
- Impersonate another person
- Gain access to confidential materials

Learners must not enter identifiable learner, staff, employer, safeguarding, health or commercially confidential information into an unapproved AI system.

AI-generated sources and information

Learners remain responsible for:

- Checking whether sources exist
- Checking facts
- Avoiding invented references
- Checking quotations

- Confirming calculations
- Removing inaccurate or discriminatory content

Submitting false references or fabricated information may be malpractice even where it was originally generated by an AI tool.

Identifying possible AI misuse

Possible indicators may include:

- A sudden unexplained change in writing style
- Language significantly different from previous work
- Generic responses lacking personal or workplace context
- Examples that cannot be explained
- Sources that cannot be verified
- Inconsistent facts
- Unusual formatting or repeated structures
- Work completed unusually quickly
- Missing development or version history
- The learner being unable to explain the content
- Responses not aligned with observed competence

The presence of one or more indicators does not prove misuse.

Educationwise may consider:

- The assessment instructions
- Previous work
- Drafts and version history
- Source checks
- Tutor observations
- Platform records
- Metadata
- Learner explanations
- Practical performance
- An authenticity discussion
- AI-indication software

Ofqual's current advice states that technological tools may help identify possible cases, but their outputs should be treated as evidence rather than as the sole determinant because of the risk of false positive and false negative results.

Educationwise will therefore not make a malpractice finding solely because an AI-detection tool produces a particular score.

Authenticity discussions

Where concerns arise, Educationwise may invite the learner to an authenticity discussion where this is permitted.

The discussion may ask the learner to:

- Explain how the work was developed
- Explain terminology or examples
- Identify sources
- Discuss decisions made
- Relate the work to their job role
- Explain drafts or changes
- Demonstrate relevant knowledge or skills

The discussion is intended to support an authenticity decision.

It must not:

- Become an unapproved replacement assessment
- Introduce different assessment criteria
- Be used to pressure the learner into admitting misconduct
- Be treated as proof simply because the learner is nervous or communicates differently

Reasonable adjustments and communication needs will be considered.

Reporting a concern

Concerns may be reported by:

- Staff
- Learners
- Employers
- Subcontractors
- Awarding Organisations

- Assessment Organisations
- EPAOs
- Members of the public
- Another provider or centre

Concerns should be reported promptly to:

Nick Preston, Director of Quality and Compliance
Email: npreston@education-wise.org
Telephone: 0117 379 0450

A concern involving Nick Preston should be reported to the Chief Executive Officer.

Urgent concerns involving assessment security, active examinations, safeguarding, fraud or loss of evidence must be reported immediately.

Immediate action

When a concern is reported, Educationwise may:

- Secure assessment materials
- Preserve digital and paper evidence
- Restrict access
- Suspend marking or internal verification
- Hold a certificate claim
- Pause submission of results
- Remove an individual from assessment duties temporarily
- Contact the relevant external organisation
- Protect learners or staff
- Notify IT support
- Consider safeguarding or data-protection action

Temporary action is precautionary and does not mean that malpractice has been proven.

Initial review

The Quality and Compliance Team will complete an initial review to determine:

- What is alleged
- Who may be involved
- Which learners or assessments may be affected

- What evidence exists
- Whether evidence needs protection
- Whether there is an immediate risk
- Whether another policy also applies
- Whether an external organisation must be notified
- Whether Educationwise is authorised to investigate
- Who should lead the investigation

The concern will normally be acknowledged within five working days.

Urgent external reporting will not be delayed to meet the acknowledgement timeframe.

External notification before investigation

Some Awarding Organisations require centres to report a suspicion before conducting a detailed investigation or interviewing the learner or staff member.

Educationwise will check the relevant requirement before progressing.

The external organisation may:

- Lead the investigation
- Direct Educationwise to investigate
- Request specific evidence
- Set the timescale
- Require a standard reporting form
- Require certification or assessment activity to be paused

Educationwise will follow those instructions.

Formal investigation

Where Educationwise is authorised to investigate, an appropriate investigator will be appointed.

The investigator should:

- Be sufficiently independent
- Understand the relevant assessment requirements
- Have access to appropriate advice
- Avoid conflicts of interest
- Maintain confidentiality

- Keep an accurate investigation record

The investigation may include:

- Assessment evidence
- Learner work
- Drafts
- Version history
- System logs
- Registration and certification records
- Emails and messages
- Assessment feedback
- IQA evidence
- Invigilator records
- Witness accounts
- Staff and learner interviews
- AI-indication reports
- Examination records
- Relevant policies and external instructions

Informing the individual

Unless an external organisation directs otherwise, a learner or staff member who is the subject of an allegation will normally be told:

- The nature of the allegation
- The evidence or concern being considered
- The process that will be followed
- Their opportunity to respond
- Their right to provide relevant evidence
- Whether they may be accompanied
- The possible external involvement
- The next steps

They must not be told that a finding has been made before the evidence has been considered.

Timescales

Educationwise will:

- Acknowledge a report normally within five working days
- Begin the initial review promptly
- Provide updates where an investigation is ongoing
- Provide a written internal outcome normally within 20 working days where Educationwise is authorised to conclude the matter

A longer period may be required where:

- The case is complex
- Several learners or programmes are affected
- External evidence is required
- An Awarding Organisation is directing the investigation
- Staff absence affects evidence gathering
- Safeguarding, criminal or disciplinary processes are involved

The individual will be informed where the expected timeframe changes.

External organisation timescales will take priority where applicable.

Standard of decision-making

A finding will be based on:

- Relevant evidence
- The applicable assessment rules
- The response of the individual
- The reliability of each source
- Whether the evidence supports the allegation

Suspicion, writing style or an AI-detection score alone will not be enough to uphold a case.

Where evidence is insufficient, the allegation will not be upheld, although proportionate improvements to controls or guidance may still be made.

Possible findings

An allegation may be:

- Upheld
- Partially upheld

- Not upheld
- Unable to be determined because evidence is insufficient
- Referred to an external organisation for decision
- Reclassified as an administrative error
- Referred under another policy

Sanctions and corrective actions

Any action will reflect:

- The seriousness of the incident
- Intent
- The effect on assessment validity
- The extent of any advantage
- Previous incidents
- The learner's circumstances
- The relevant external requirements
- Educationwise's authority

Learner outcomes

Possible learner outcomes may include:

- No action
- Guidance or additional training
- A formal warning
- A requirement to demonstrate authenticity
- Resubmission or reassessment where permitted
- Invalidating affected internal evidence
- Removal from an assessment opportunity
- Referral to an Awarding Organisation
- External loss of marks or disqualification
- Withdrawal from the programme in the most serious cases

Educationwise will not impose an Awarding Organisation sanction that it has no authority to apply.

Staff outcomes

Possible staff outcomes may include:

- Guidance
- Retraining
- Increased supervision
- Increased IQA sampling
- Temporary removal from assessment activity
- Removal of assessor or IQA approval
- A formal People and Culture process
- Disciplinary action
- Contract termination
- External reporting

Organisational corrective action

Possible corrective action may include:

- Correcting learner records
- Withdrawing an incorrect certificate claim
- Additional sampling
- Reviewing affected learners
- Reassessment
- Revising processes
- Strengthening system controls
- Staff training
- Subcontractor action
- Updating a risk
- Adding an action to the Quality Improvement Plan
- Reporting through governance arrangements

External reporting

Educationwise will report suspected or confirmed malpractice or maladministration where required.

This may include reporting to:

- An Awarding Organisation

- An Assessment Organisation
- An End-Point Assessment Organisation
- The Department for Education
- Ofqual, normally through or as directed by the Awarding Organisation
- The police
- The Information Commissioner's Office
- A safeguarding partner
- Another funding or regulatory body

Educationwise will not automatically notify every organisation about every case.

The reporting route will reflect:

- The nature of the incident
- The organisation responsible for the assessment
- The qualification requirements
- Funding implications
- Whether criminal, safeguarding or data-protection concerns exist

Internal investigation must not delay a required external report.

Public funding and fraud

Where the concern may also involve:

- False funding evidence
- Fictitious learners
- Fabricated attendance
- False off-the-job training
- Incorrect funding claims
- Financial gain
- Bribery or corruption

the matter will also be considered under:

- Counter Fraud and Error Policy
- Ethics and Anti-Bribery Policy
- Relevant DfE reporting requirements

Safeguarding and learner welfare

Where an allegation indicates that a learner or another person may be at risk of harm:

- The safeguarding team will be informed immediately
- The Safeguarding and Prevent Policy will apply
- Safeguarding action will not be delayed while the malpractice investigation continues
- Information will be shared only where necessary

Support needs or vulnerability will be considered, but they do not prevent Educationwise from protecting assessment integrity.

Rights and support

A learner or staff member involved in a formal process may:

- Receive information about the concern
- Provide a response
- Submit relevant evidence
- Request a reasonable adjustment
- Be accompanied at a formal meeting by a suitable person
- Receive a written outcome
- Use the relevant appeal route

The accompanying person may provide support but should not normally answer questions on the individual's behalf unless agreed as a reasonable adjustment.

Appeals

An individual may appeal an Educationwise malpractice or maladministration decision where they believe:

- The process was not followed
- Relevant evidence was not considered
- The decision was unreasonable
- There was bias or a conflict of interest
- A reasonable adjustment was not provided
- Significant new evidence has become available

The appeal must normally be submitted within 10 working days of the decision.

The appeal will be considered by a person who:

- Was not responsible for the original decision
- Was not directly involved
- Does not have an unmanaged conflict of interest

A written appeal outcome will normally be provided within 15 working days.

Where the original decision was made by an Awarding Organisation, Assessment Organisation or EPAO, the external organisation's appeals process and timescales will apply.

Educationwise cannot overturn an externally imposed sanction.

Where the original matter or appeal concerns the Director of Quality and Compliance, it will be managed by the Chief Executive Officer or another suitably independent person.

Record keeping

The Quality and Compliance Team will maintain a secure incident log covering:

- Date reported
- Nature of the allegation
- Learners, staff or programmes affected
- Immediate safeguards
- Evidence
- External notifications
- Investigator
- Findings
- Outcome
- Sanctions
- Corrective actions
- Appeals
- Lessons learned
- Closure date

Records will be retained in line with:

- Awarding Organisation requirements
- Assessment Organisation or EPAO requirements
- Funding and contractual requirements
- Educationwise's Records Retention Schedule

- Data-protection law

Relevant records must not be destroyed while an investigation, appeal, audit or legal matter remains open.

Data protection

Personal information will be handled in line with the Data Protection Policy.

Educationwise will:

- Collect only relevant information
- Restrict access
- Store investigation records securely
- Avoid unnecessary disclosure
- Share information where legally or contractually required
- Retain records for the appropriate period
- Dispose of records securely

Investigation records must not be stored within general learner notes where this would provide unnecessary access.

Monitoring and governance

The Quality and Compliance Team will monitor:

- Number and type of allegations
- Learner and staff cases
- Programmes and provision types
- AI-related concerns
- Assessment methods affected
- Outcomes and sanctions
- Response times
- Repeat cases
- Subcontractor concerns
- External notifications
- Corrective actions
- Appeals
- Emerging risks

Themes may inform:

- IQA sampling
- Standardisation
- Staff development
- Learner guidance
- Assessment controls
- Subcontractor monitoring
- The Quality Improvement Plan
- Risk-register activity
- Self-assessment
- Leadership and Board reporting

Significant risks may be reported through:

- Senior Leadership Team
- Quality and Compliance Committee
- Fraud and Error Committee where relevant
- Safeguarding and Prevent Committee where relevant
- Master Risk Committee
- The Board

Information will normally be reported without unnecessary personal details.

Training and awareness

Relevant staff will receive information or training covering:

- Assessment authenticity
- Plagiarism and collusion
- Artificial intelligence
- Examination security
- Reasonable adjustments
- Reporting routes
- Evidence preservation
- Investigation fairness

- Awarding Organisation requirements
- Registration and certification controls
- Conflicts of interest

Learners will receive appropriate guidance during:

- Onboarding
- Assessment briefing
- Examination preparation
- Tutor feedback
- Programme reviews
- Any reminder following an identified concern

Related policies and procedures

This policy should be read alongside:

- Learner Code of Conduct Policy
- Examination Policy
- Internal Quality Assurance Policy
- Learner Appeals and Complaints Policy and Procedures
- Reasonable Adjustment and Special Consideration Policy
- Conflict of Interest Policy
- Data Protection Policy
- Security Policy
- Counter Fraud and Error Policy
- Ethics and Anti-Bribery Policy
- Safeguarding and Prevent Policy
- Public Interest Disclosure Policy
- Learner Recognition of Prior Learning Policy
- Enrolment, Registration and Certification Policy
- Subcontracting Policy
- Records Retention Schedule
- Relevant Awarding Organisation requirements

- Relevant apprenticeship assessment requirements

Monitoring and review

This policy will be reviewed annually because assessment requirements, artificial-intelligence tools and external guidance can change quickly.

It will be reviewed sooner where there is:

- A significant malpractice or maladministration case
- An Awarding Organisation requirement
- A change in AI guidance
- A change in apprenticeship assessment arrangements
- A quality-assurance or audit finding
- A change in examination or assessment delivery
- A recurring pattern of concern
- Evidence that controls are not operating effectively

Appendix 1: Artificial Intelligence Review Checklist

Purpose

This checklist supports tutors and assessors where there is a concern about the authenticity of submitted work.

It is not an AI-detection test and must not be used as a scoring system.

The presence of an indicator does not prove misuse.

Possible indicators

Consider whether there is:

- A sudden or unexplained change in writing style
- Vocabulary significantly different from previous work
- Generic content with little learner or workplace context
- Examples the learner cannot explain
- Incorrect or invented references
- Contradictory information
- Repeated phrasing or unusual structure
- No evidence of drafting or development
- Work produced in an unusual timeframe

- Content not consistent with observed competence
- A learner who cannot explain how the answer was developed
- An undeclared AI-style response where use may have been permitted

The overall evidence and assessment requirements must be considered.

Level 1: Routine clarification

Possible position:
A limited concern or one possible indicator is present.

Action:

- Discuss the work with the learner
- Check understanding
- Remind the learner of assessment and AI requirements
- Correct any unclear declaration
- Record a brief note where appropriate

Possible outcome:

- Authenticity is reasonably confirmed
- Minor guidance is provided
- No formal allegation is made

Level 2: Authenticity review

Possible position:
Several concerns are present or authenticity remains unclear.

Action:

- Pause the assessment decision
- Review earlier work
- Check sources and version history
- Complete an authenticity discussion where permitted
- Seek IQA advice
- Review the assessment-specific AI rules
- Record the evidence considered

Possible outcome:

- Authenticity is confirmed and assessment continues

- Further evidence or clarification is requested where permitted
- A minor assessment issue is corrected
- The concern is referred for formal initial review

A learner must not automatically be required to resubmit solely because several indicators are present.

Level 3: Formal referral

Possible position:
There is specific evidence that the work may not be authentic or that assessment rules may have been breached.

Action:

- Do not make a final assessment or malpractice decision
- Protect the evidence
- Refer the concern to the Quality and Compliance Team
- Check whether the Awarding Organisation must be informed before further investigation
- Inform the learner in line with the agreed process
- Follow the formal procedure in this policy

Possible outcome:

- Formal investigation
- External referral
- No case to answer
- Corrective action
- A proportionate sanction where malpractice is upheld

An assessment must not be rejected as malpractice until the proper process has been followed and the relevant evidence has been considered.