



Sanctions policy

Introduction

This policy is aimed at centres delivering PMI approved qualifications or units and who have failed to meet aspects of our delivery requirements and/or the standards laid down by the regulatory authorities in respect of regulated qualifications and units. It sets out the sanctions PMI may impose on centres in such situations.

It is also for use by our staff to ensure they apply any sanctions in a consistent manner.

Centre's responsibility

It's important that your staff involved in the delivery of our qualifications are fully aware of the contents of the policy and its possible implications on your centre should you fail to comply with requirements specified by PMI in relation to the delivery of our qualifications (some of which are required of us by the regulators).

Review arrangements

We'll review the policy annually as part of our self-evaluation arrangements and revise it as and when necessary in response to customer feedback, trends from our internal monitoring arrangements, changes in our practices, actions from the regulatory authorities or external agencies or changes in legislation.

If you would like to offer any views please contact us via the details provided at the end of this policy.

Ensuring the standards of our qualifications and units

PMI has a responsibility to the learners taking our qualifications and the UK regulatory authorities to ensure that centres deliver our qualifications and units in accordance with relevant national standards.

Approach to sanctions

PMI has a range of sanctions that can be imposed on a centre depending on the seriousness of the situation, the level and track-record of the centre's non-compliance and the risk to the interests of learners and the integrity of the qualifications and units.

Nonetheless PMI aims to ensure that the application of sanctions is a last resort and through our approach to centre support and management, and the creation of appropriate action plans, we will work with centres to prevent situations arising that would warrant a sanction being imposed.

However, if sanctions are required then we will not hesitate to apply them – with the sanction(s) being applied depending on the nature of the situation. For example if the centre has¹:

- Outstanding actions
- Poor records to confirm assessment decisions
- No lead quality officer/internal verifier in place
- Proven collusion or persistent bad marking of centre marked assessments
- Suspected or proven cases of maladministration/malpractice at the centre and/or the services provided by the centre and/or its satellite centres or third parties
- Made certification claims before learners have completed the unit(s)/qualification(s)
- A increased likelihood of an adverse effect occurring (e.g. something that is likely to have an adverse effect on the standards of the qualifications they are delivering or public confidence in qualifications)
- Refused access to premises and/or records to the staff of PMI or the regulatory authorities
- Breached any requirement contained in the centre recognition and/or qualification approval application submitted by the centre and accepted by PMI
- Repeatedly breached requirements contained in the centre recognition and/or qualification approval application submitted by the centre and accepted by PMI in such a manner as to reasonably justify doubts about its ability or intention to deliver our qualifications and services in accordance with the terms of outlined in the application(s)

It is important to note that the following are not classified as sanctions, but standard good awarding organisation or business practice and they may be applied instead of a formal sanction and/or alongside a sanction:

- When a centre is first recognised and approved by us to offer one of our qualifications, and/or if they have subsequently applied and been approved to offer another qualification in a sector or qualification type that is significantly different from

¹ The examples for recommending and imposing sanctions in this section and below are only indicative and are not meant to form an exhaustive list.

previous qualifications they offer, we will approve the centre to offer the qualification(s) and not process any certificate claims for the qualification(s) until the centre has received a satisfactory monitoring visit. This approach is normal practice amongst awarding organisations and is generally seen as good practice and is intended to help ensure the centre is delivering this 'new' qualification effectively before certificates can be issued.

- Should a centre refuse to pay outstanding fees after various contact with our Finance team, then we may remove approval and/or centre recognition with immediate effect. Such a decision would not be considered a sanction but a commercial decision.
- Undertaking additional visits to a centre to provide them with a greater level of support and/or monitoring depending on their needs and performance.
- Requiring specific centre staff to undergo additional training and/or scrutiny by the centre if there are concerns about their ability to undertake their role in the delivery of our qualifications effectively. Such decisions would normally be communicated to the centre via a 'action' following an centre engagement visit. It is important to note that we reserve the right to impose a number of restrictions against individuals at any time. Ordinarily restrictions would be imposed against individuals either during or prior to conducting an investigation into maladministration or malpractice connected to a Centre with whom the individual(s) is/are connected. Restrictions against individuals may include not permitting specific staff to be involved in the delivery/assessment of our qualifications for a specified period of time.
- Altering the way, and the period in which, centres receive examination/assessment materials from PMI if there are concerns around their ability to maintain the security and confidentiality of such materials.
- Appointing our staff to observe an exam/assessment at the centre if there are concerns around the centre's arrangements and/or the centre is unable to resource particular exams/assessments. Such actions will be discussed with the centre during or after a centre engagement visit.

Sanctions that may be imposed

Sanctions that may be imposed as part of a centre recognition/qualification approval decision, monitoring activity or investigation into a complaint, appeal or allegation of malpractice and/or maladministration include **withholding certificates** (e.g. suspending certification status) and **preventing further learner registrations by the centre** (e.g. suspending registration status):

- A single qualification
- An entire qualification sector
- An entire qualification type
- All qualifications

Recommendations in relation to the above types of sanctions will be reviewed by the Responsible Officer, and if there is clear evidence of non-compliance by the centre and/or a sufficient rationale then the sanction will be imposed on the centre.

In all instances the nature of the sanction and the rationale for its application will be communicated in writing to the centre.

If a centre disagrees with the decision the first point of call is the relevant EV then our Responsible Officers and then PMI's appeals arrangements.

Only in exceptional circumstances of extremely serious non-compliance or the persistent failure of the centre to address outstanding actions, and/or the failure of previous sanctions to address the issue, would PMI impose, via the Responsible Officer the ultimate sanction of **removal of qualification approval** in relation to:

- A single qualification
- An entire qualification sector
- An entire qualification type
- All qualifications and in turn the centre's 'recognition' with PMI

PMI expects that it would never impose the immediate withdrawal of approval for a qualification or range of qualifications without:

- the centre being given an opportunity to address the area(s) of non-compliance
- first of all imposing one of the previous sets of sanctions
- there being evidence that the non-compliance poses a significant threat to the interest of learners or the integrity of the qualifications and units

Should a centre have its approval for a qualification/suite of qualifications removed, we will take all reasonable steps to protect the interests of any learners currently registered on the qualification(s). For example, we will either certificate them for any achievements achieved to date and/or seek to transfer them – where possible and feasible – to another centre to enable them to carry on with their learning.

In addition, upon the removal of approval, the centre shall:

- immediately cease to offer PMI qualifications and services and shall at its own expense immediately deliver to PMI all relevant and specified deliverables (e.g. assessment materials) and/or dispose of materials if instructed to do so by PMI. If the centre fails to do so we may take action to recover such materials where relevant.
- immediately cease to operate as a centre recognised/approved by PMI and shall immediately cease to describe, promote, market or advertise itself as a centre approved by and/or offering the relevant qualification(s)/service(s);

Sanctions that may be imposed on learners

Should a learner, or range of learners, be found to have committed Malpractice then the following sanctions may be imposed on them in accordance with the arrangements outlined in our Malpractice and Maladministration policy (which may be communicated to the learner by PMI and/or the learner's centre):

- Issuing a written warning that if the offence is repeated further action may be taken
- Loss of all marks/credits for the related work/unit
- Disqualification from the unit(s)/qualification
- Placing a ban from taking any further qualifications with us (e.g. for a set period of time)

Ensuring consistency in our approach

The length of time any of the above sanctions will be imposed for will depend on the situation that warranted their introduction.

The Responsible Officer will be responsible for regularly reviewing the application and maintenance of sanctions to ensure they continue to be appropriate and proportionate to the incident(s) and risk of future incidents occurring.

Contact us

If you've any queries about the contents of the policy, please contact KHoodless@pensions-pmi.org.uk with the subject title "Sanctions".