



Plagiarism, Collusion, Cheating Policy

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1. Overview

Professional Assessment Ltd (PAL) is committed to upholding the highest standards of integrity, honesty, and originality in all aspects of qualification/apprenticeship design, development, delivery and awarding.

This policy is intended to provide information and guidance to approved Centres, and Third Party Providers and Colleges, Learners/Apprentices, as well as PAL personnel on what constitutes plagiarism, cheating and collusion, and what PAL Centres, Third Party Providers and PAL personnel can do to prevent acts of cheating from occurring and how any instances that do occur should be managed.

Plagiarism, cheating and the misuse of Artificial Intelligence (AI) are serious offenses that undermines assessment integrity, and they have the potential to severely undermine the credibility and reputation of individuals and organisations involved in the delivery and awarding of qualifications/apprenticeships.

Acts of plagiarism and cheating and misuse of AI will be regarded as malpractice and where proven, PAL will apply such sanctions as detailed in our sanctions policy.

2. Policy Scope

This policy applies to all forms of assessment and addresses any aspect of behaviour that intentionally or inadvertently has the potential or directly alters assessment outcomes in a way the results are not a reflection of an individual’s performance.

The policy addresses the definitions of plagiarism, collusion and cheating, methods of identifying such acts, the misuse of AI, reporting of acts of plagiarism and the policy outlines PAL’s expectations of Centres, Third Party Providers/Colleges and PAL personnel regarding practices and approaches to safeguarding assessment outcomes.



This policy should be read in conjunction with PAL's:

- Maladministration and Malpractice Policy.
- Sanctions Policy.
- Appeals and Enquiry Policy.
- Invigilation Policy.
- Special Considerations and Reasonable Adjustments Policy.
- AI Guidance.
- PAL's Investigation Procedure.

3. Who Is This Policy For?

- Centres and Centre personnel /Third Party Providers/Colleges and personnel.
- Learners/Apprentices.
- PAL personnel (employed and engaged).

4. Purpose

The Plagiarism, Cheating, Collusion Policy sets PAL's framework for ensuring assessment integrity across all qualifications and apprenticeship standards which is designed to support regulatory compliance and the maintenance of assessment and qualification credibility and integrity.

This policy is designed to act as a deterrent to anyone who might consider presenting work that is not of their own making.

5. Definitions

5.1 Plagiarism

'Plagiarism' means presenting work, excerpts, ideas, or passages of another author without appropriate referencing or attribution. In relation to Learner assessment, a Learner/Apprentice will be said to have plagiarised someone else's work if it has been confirmed through the assessment marking, or internal and external quality assurance processes that the work they have submitted has either been directly copied from, or is highly comparable to, another Learner's/Apprentice's work or it has been directly taken from another academic or published source without appropriate references to that source being included.

Plagiarism will also be considered to have occurred when it has been identified (using suitable, widely available software) that it is highly probable that a Learner/Apprentice has used Artificial Intelligence (AI) to generate assessment answers which have been submitted as their own work. Work which has been generated using AI, for which the sources have been verified, and which has been appropriately referenced, may still be considered to have been plagiarised, depending on the extent of its use and how AI generated information has been contextualised to reflect the individual Learner's/Apprentice's knowledge, skills and experience.

5.2 Collusion

'Collusion' occurs when two or more Learners/Apprentices submit work which is so alike in ideas, content, wording and/or structure that the similarity goes beyond what might have been mere coincidence. It should be understood by all personnel referred to in this policy that whilst the discussion of ideas, working in groups (where permitted as part of a learning programme or qualification/apprenticeship) and other forms of verbal discussion are acceptable, the sharing of a Learner's/Apprentice's written response to an assessment is NOT acceptable. To do so, even with the best intention, leaves the Learner/Apprentice open to their work being used without their knowledge and could lead to allegations of collusion.

5.3 Cheating

'Cheating' is defined as any deliberate act by a Learner/Apprentice (or those in collusion with a Learner/Apprentice) which leads to an assessment outcome being generated which is a false representation of the Learner's/Apprentice's knowledge, skills, or ability. Acts such as a Centre or Third Party Provider, Trainer, providing Learners/Apprentices

with answers to multiple choice question (MCQ) papers, giving hints throughout the course that will provide Learners/Apprentices with an unfair advantage in an assessment, or Learners/Apprentices passing answers to each other during the assessment process would be considered as cheating.

5.4 Artificial Intelligence

'Artificial Intelligence' AI use refers to the use of AI tools to obtain information and content which might be used in work produced for assessments which lead towards certificated qualifications/apprenticeships. While the range of AI tools, and their capabilities, is likely to expand greatly in the near future, misuse of AI tools (intentionally or unwittingly) in relation to qualifications and apprenticeship assessments at any time constitutes malpractice.

At PAL, we hold high standards of academic and assessment integrity. PAL considers both the inappropriate use of Artificial Intelligence (AI) software for the completion of an assignment as both cheating and collusion as well as the outsourcing of an assignment to a third party such as the use of 'Essay Mills', as collusion and a deliberate intention to pass off the work of others as the Learner's/Apprentice's own. Therefore, the **misuse of AI tools** in relation to qualification/apprenticeship assessments at any time and the subcontracting of assignments is never acceptable and constitutes malpractice.

PAL expects Learners/Apprentices to produce original content that is attributed to their authorship in all assessments. This means ensuring that submitted assessments are in their own words and are not copied or paraphrased from another source such as an AI tool and that the content reflects their own independent work and submission.

Learners/Apprentices are expected to demonstrate their own knowledge, skills and understanding as required for the assessment. Centres/Third Party Training Providers/Colleges should encourage Learners/Apprentices to develop their own thinking and demonstrate their knowledge and skills through their own work by evidencing their own experience and relating theory to practice when required. This is an important aspect of the learning process.

For further information and guidance regarding the use of AI, please refer to PAL's AI guidance.

6. PAL's Responsibilities as an Awarding and Assessment Organisation

PAL is an awarding and assessment organisation recognised and regulated in the UK by the qualification regulator Ofqual. As such, PAL is required to maintain compliance with all regulatory requirements imposed by the regulator and any other bodies that mandate or stipulate how qualifications and regulated apprenticeship standards are to be delivered and awarded. As part of our responsibilities in this respect, PAL is required to take all necessary steps to prevent Adverse Effects from occurring in relation to Learner/Apprentice assessment.

An Adverse Effect is an act, omission, event, incident, or circumstance that can occur through assessment or qualification development, delivery or awarding that gives rise to a Learner/Apprentice being advantaged or disadvantaged compared to other Learners/Apprentices in some fashion.

Through the process of developing qualifications/apprenticeships assessments, PAL will consider the ways in which the security and integrity of assessments could potentially be compromised, including the ways in which Learner/Apprentice plagiarism, cheating and collusion could take place in relation to the applicable qualification/apprenticeship assessment methods. In considering this, PAL will implement security measures, create assessment guidance documentation, and provide advice and guidance to all pertinent stakeholders with a view to preventing plagiarism, cheating, collusion and (as a consequence) Adverse Effects from occurring through the assessment process. The preventative measures implemented will differ dependent on the assessment methodology for each qualification/apprenticeship.

PAL has a responsibility to ensure that Learners/Apprentices undertaking our qualifications/apprenticeships understand what is expected of them in terms of their behaviour and performance through course delivery and the qualification/apprenticeship assessment process. All Learners/Apprentices undertaking PAL qualifications/apprenticeships must read, understand, and abide by this policy and this includes the detail that they

must refrain from any activity which would constitute Learner/Apprentice malpractice (i.e. plagiarism, collusion, or cheating).

PAL has a Malpractice and Maladministration Policy which is freely available to all on the PAL website. This policy outlines definitions of malpractice and maladministration, responsibilities in identifying and investigating such and details of the investigation process carried out by PAL when suspected or actual cases of malpractice/maladministration arise.

To support understanding appendix one of this policy provides a high level summary which clarifies what PAL expects from Centres and Third Party Providers/Colleges.

PAL will from time to time obtain information about approved Centres or Third Party providers, through quality assurance activities or other sources (e.g. whistleblowers) which suggests that Learner/Apprentice plagiarism, collusion or cheating has taken place. Where such information is brought to PAL's attention, PAL will investigate to establish the circumstances surrounding the event. In some circumstances PAL may allow a Centre to undertake such an investigation, for the parent Centre, and all EPA work PAL will undertake such investigations. Please refer to PAL's investigation procedures.

PAL will review¹ all cases of notified, alleged, identified cases of cheating, collusion and plagiarism for Centre and PAL assessments. "All suspected or actual risks relating to plagiarism, cheating, collusion or AI misuse will be logged into PAL's governance system and evaluated in line with PAL's Risk & Incident Management framework and Ofqual Condition A6.

PAL will notify the regulator of any suspected or proven cheating on discovery, prior to an investigation conclusion. PAL's Responsible Officer will keep the regulator informed of the investigation progress and final conclusion.

Once an investigation has been carried out and concluded, PAL decide on an appropriate course of action, and where sanctions are applied this will be done in accordance with PAL's Sanctions policy, incorporating any conditions from the regulator, where the regulator has provided such information.

6.1 PAL Approved Centre Responsibilities- Assessment and Quality Assurance

In the context of qualifications and reformed apprenticeships, subject to Centre approval and recognition, Centres are responsible for all or some of the assessment activities dependent on the relevant assessment strategy and specification as compiled by PAL. In this environment, Colleges or Training Providers are Centres.

In the context of reformed apprenticeship standards, assessment can be shared between the AO and Centre, and a training Provider or College must have Centre status to undertake assessments.

In the context of EPA, PAL undertakes all elements of the end-point assessment. In this environment Colleges or Training Providers are Third Parties. PAL expects Third Parties and Apprentices to abide by this policy and PAL will operate our EPA service in a way that seeks to deter and prevent acts of cheating.

PAL approved Centres are required to meet with various requirements relating to qualification/apprenticeship delivery and Learner/Apprentice assessments in order to maintain their approved status with PAL. In meeting these requirements, PAL approved Centres are required to take all necessary steps to ensure the security and integrity of the Learner/Apprentice assessment process with a view to the prevention of plagiarism, collusion, or cheating.

¹ Even where a Centre is permitted to undertake an investigation, PAL will want oversight of the investigation and will review the findings and has the authority to overturn a Centre's decision or undertake a further investigation

This includes measures such as ensuring:

- All Learners/Apprentices have read and understood their responsibilities as outlined in this policy and the Centre's policy addressing appropriate conduct for assessment and submission of Learner's work.
- The Centre has a policy that specifically deals with plagiarism, collusion and cheating and the use of AI, that is regularly reviewed by the Centre and made available to the PAL Quality Team (see Appendix One for suggestions on what such a policy should contain).
- Access is restricted to Assessment and Quality Assurance records at the Centre (e.g. only those involved in assessing Learners/Apprentices and internal quality assurance for named qualifications/apprenticeships should ideally be permitted access).
- All Learner/Apprentice assessment documentation and records are stored securely prior to and after assessment has taken place (this includes the transportation of paper-based tests and documents, where the Centre has approval from PAL for such approaches).
- All assessments are carried out under appropriate assessment conditions and invigilated in line with PAL guidance and qualification/apprenticeship specifications and assessment strategies and marking guidance (including e-Assessment).
- Copies of all assessment paperwork that are sent electronically by the Centre are sent using secure methods.
- During MCQ assessments and invigilated exams, Trainers/Assessors/Invigilators must be aware of their responsibility to ensure that Learners/Apprentices do not attempt to plagiarise, collude, or cheat. Trainers/Assessors must be vigilant at all times and ensure no attempts are made during assessments/exams to pass answers or view other Learner's/Apprentice's question papers.
- Trainers, Assessors and IQAs who are responsible for managing the Learner/Apprentice assessment process at approved Centres must also be aware of their responsibility to check when marking and internally quality assuring assessments for any indication that plagiarism, collusion, or cheating has taken place. This includes, as examples (the list is not exhaustive):
 - Directly comparing answers provided in written work submitted by a Learner/Apprentice cohort or Learners/Apprentices from the same employer to ensure they are not 100% or directly comparable to each other.
 - Using suitable, widely available software, to check the content of Learner/Apprentice written work submitted to ascertain whether there is a high probability that any answers provided have been generated using AI. PAL's AI guidance provides more information.
 - Where the Centre marks written tests, comparing scripts across Learners/Apprentices to ensure they are not 100% or directly comparable to each other, or use the same examples, when the Learner/Apprentice is asked to provide examples of learning application, or demonstrate the same flaws and mistakes or misunderstanding of specific questions.
- Any Trainer/Assessor/IQA who suspects or identifies that plagiarism, collusion or cheating has taken place through any assessment process should inform the Head of Centre (or nominated Centre person) of the situation immediately. The Centre must then promptly inform PAL.

6.2 PAL Third Party Providers/Colleges

Third Party Providers in the context of EPA do not undertake assessment or quality assurance however they are responsible for instilling in their Learners/Apprentices how to prepare for end-point assessment and demonstrate competence in set assessment settings. Learners/Apprentices may as part of their end-point assessment have to

present projects or portfolios or undertake tests, and it is vital they understand the requirements of authenticity and that any form of assessment must be a summation of their performance, not others. Third Parties therefore need to ensure their Learners/Apprentices and personnel follow their organisation's policy and have access to PAL's policy and PAL's AI guidance.

6.3 PAL Responsibilities Assessment and Quality Assurance

Where PAL carries out assessments, our assessors and IQAs have the same obligations and responsibilities we place on recognised/approved Centres.

7. Prevention

Learners/Apprentices must be advised following enrolment (at induction is ideal) of the Centre's/Third Parties and PAL's Plagiarism, Cheating, Collusion Policy. Learners/Apprentices must be clear on what are flagrant contraventions of assessment integrity and the consequences of any transgressions.

Centres and Third Parties should have suitable policies and procedures for identifying, minimising the occurrences of, and acting when they suspect or have evidence of plagiarism, collusion, and cheating, that clearly outline roles and responsibilities, reporting of such events and sanctions for proven cases. PAL's approval process and on-going Centre monitoring will review the existence of policies and procedures, and their implementation. For Third Party Providers/Colleges PAL's risk analysis and Assessment/Account Management activities track an organisation's orientation and approach to assessment integrity.

Learners/Apprentices and personnel in Third Party providers/Colleges and Centres must be familiar with the consequences of cheating, collusion and plagiarism, likewise personnel in these setting must also know the penalties for breaching assessment integrity.

PAL personnel are required to be familiar with this policy and associated policies and procedures, and they will receive training to support them to identify plagiarism, cheating and collusion and actions to take. Any PAL personnel found to be supporting, encouraging or allowing any forms of cheating will be subject to disciplinary action, sanctions and in some cases employment contracts or service level agreements maybe terminated.

PAL personnel involved in assessment and quality assurance are obligated to ensure Centres/Third parties and Learners/Apprentices they work with are appropriately briefed regarding the regulatory requirements and PAL's expectations regarding the delivery of assessments and ensuring safe and reliable results.

Plagiarism, collusion, and cheating can occur because Learners/Apprentices or Centre/Third Party personnel are not familiar with the qualification/apprenticeship requirements and the rules and parameters of evidence and assessment, specifically for Learner's/Apprentice's plagiarism can occur because:

- Learner's/Apprentice's lack of awareness of evidence production requirements.
- Learner's/Apprentice's lack of skill in research, using source material/acknowledging the use of the material.
- Common use of the internet as a source of ideas/information and not appreciating copyright practice and the implications of Open Educational Resources (OER) tags and AI references and what that means regarding the use of such information.
- Pressure on a Learner/Apprentice to succeed.
- Learner/Apprentice not permitted sufficient time to develop ideas, own research, and rationale for assessments such as projects and reverting to shortcuts.

All parties involved in assessment and quality assurance of PAL apprenticeship assessments or qualifications must have an understanding of:

- What plagiarism, collusion and AI misuse are and their different formats.
- The boundaries of plagiarism, collusion and AI misuse and how to ensure that Learners/Apprentices do not cross the line, either unintentionally or intentionally.
- The importance of developing Learners'/Apprentices' research skills and developing their confidence in their own abilities reducing the temptation to undertake plagiarism, collusion, and AI misuse.
- The methods of detection for plagiarism, collusion, and AI misuse, for example, software, second marking, internal and external quality assurance, and the use of viva, and/or professional discussions. See PAL's AI guidance for further details.
- The impact and further consequences of their training and qualification progression and outcomes as a result of plagiarism, collusion, and AI misuse.

7.1 Preventing Plagiarism

PAL advocates the use of recognised plagiarism software checks on written work to detect plagiarism and where such checks indicate possible plagiarism, further investigations must be undertaken to ensure the allegation of plagiarism is correct, software tools are not 100% accurate and can present false positives.

Where Centres or Third Parties suspect or detect plagiarism, they must inform PAL.

PAL as part of our IQA/EQA activities (dependent on our role in assessment) will subject assessment products to plagiarism checks.² PAL uses reputable plagiarism software programmes, supported by quality assurance reviews and robust sampling to detect plagiarism, where detected we will follow up with relevant personnel to ensure we have reviewed all the facts and circumstances surrounding the evidence submission.

Proven plagiarism can result in sanctions at individual and organisational levels and non-validation of assessment outcomes.

Centre Assessments

Learners/Apprentices should be requested to complete and sign an authenticity check confirming any work they present is their own. Any contravention of the authenticity check should then result in sanctions from the Centre in the first instance, and dependent on the nature and severity of the circumstances may result in the imposition of PAL sanctions.

Where Learners/Apprentices are working on the same qualification/apprenticeship and group work is a feature of the programme, the Centre assessors and the quality team should pay particular attention to any submitted assessment products, as required by the qualification/apprenticeship, to detect any excessive similarities or extensive copying of written work or work products, where qualifications/apprenticeships are undertaken in a work situation or require a period of work placement.

PAL recognises that some Learners/Apprentices will be unfamiliar with the need to cite others work, mainly where internet sites have been used for research and Learners/Apprentices mistakenly believe because information is in the public domain, they do not have to cite or quote such references. PAL encourages Centres to inform all of their Learners/Apprentices of basic referencing requirements, alongside making sure all relevant stakeholders have had sight of this policy.

² Plagiarism software is not a 100% accurate, so where it is used, human judgement and discussions with relevant parties should be considered to substantiate the authenticity and originality of any evidence.

PAL Assessments

Where PAL personnel undertake assessments, they are subject to all of the conditions in this policy and PAL will require evidence authenticity checks and will scrutinise evidence for any indication of cheating, plagiarism or collusion and in accordance with this policy and associated policies take action accordingly.

Referencing

PAL's recognises that plagiarism can at times be unintentional and is a result of the Learner/Apprentice not explicitly noting external references. PAL as part of our support materials provides guidance on referencing and we require Centres/Third parties to support their Learners/Apprentices in this area of their evidence presentation.

Inadvertent plagiarism through poor or no referencing is regarded as maladministration and will be treated accordingly.

PAL guidelines to referencing for Learners/Apprentices (and the list is not exhaustive) is as follows:

- If you use someone else's exact words in your work, they must be in quotation marks. Use quotations sparingly and only when you feel the author has expressed something so well and so concisely that the words cannot be improved.
- If you use the internet to research and source information, you must provide the URL link, the title of the webpage and author where cited and date the webpage was last accessed by 'you'.
- When you have used a quote, you must provide the name of the author, the date of their work that you have referred to and the page number where you got the quotation from immediately after the quotation or provide the website URL and date accessed.
- You must provide a bibliography - a list of books, articles, and any other sources you have quoted - at the end of your assignments.
- The Harvard system for referencing sources is well-established, and you can find guidance on how to use it on the internet. Note Harvard referencing is typically for level 4 Learners and above.
- **When referring to a book the Harvard format is: Gill, P. (2004) Concepts of negotiation: a guide for managers. Publisher name, location of publisher e.g. Brighton.**
- **And for a reference to an article, the Harvard format is: Spratt, J.D. (2017) it takes time: a 'stages of change' perspective on the adoption of workplace coaching skills. Journal of Change Management, 10(1), pp. 61-77.**

Where referencing is required, PAL does consider the level of qualification/apprenticeship and the Learner's/Apprentice's previous experience in writing formal assignments or projects and the relevant specification will provide further guidance regarding such requirements.

Appeals - Plagiarism -Centre Assessment

If a Learner/Apprentice wishes to appeal against a decision of plagiarism, they should refer in the first place to the Centre Appeals and Enquiry policy. PAL will require the Centre to have undertaken a thorough investigation into the situation and applied any sanction fairly and proportionally, whilst advising the Learner/Apprentice of their right to appeal.

If the Centre's policy and procedure has been exhausted, then the Learner/Apprentice can refer to PAL. Note for some Centres such as the parent Centre PAL will oversee any investigation and rule on any sanctions.

Learners/Apprentices should recognise that proven plagiarism is a serious breach of assessment requirements and can result in a debarment from completing their qualification or apprenticeship standard with PAL. In addition to any individual Learner/Apprentice sanction, PAL may also find that sanctions need to be directed to Centre/third Party personnel or given at an organisation-wide level.

Appeals - Plagiarism - PAL Assessment

Please refer to PAL's enquiry and appeals policy.

7.2 Preventing Collusion

Learners/Apprentices must be clear about when assessment relies on individual performance and the requirement of 'own work'. Group work regarding research, project work and presentations should provide Learners/Apprentices with clear instructions regarding contributions, and how such work will be assessed.

In all cases, Learners/Apprentices must know that presenting the same or highly similar work of their peers or others, firstly will be subject to scrutiny and secondly may be regarded as inadmissible evidence and rejected either by the Centre or the Awarding/Assessment Organisation.

Learners/Apprentices who submit work which is either a 100% match or highly/directly comparable to either another Learner's/Apprentice's work or another academic source will be considered guilty of plagiarism (and/or cheating/collusion) and their assessment outcomes are subject to non-validation and sanctions at individual and organisational levels.

Appeals - Collusion - Centre Assessment

Please refer to the plagiarism section 7.1

Appeals - Collusion - PAL Assessment

Please refer to PAL's enquiry and appeals policy.

7.3 Preventing Cheating - Tests

Anyone undertaking the role of an invigilator is responsible for the appropriate supervision of tests and the invigilation of the assessment in accordance with the relevant qualification/apprenticeship and the Centre's and PAL's invigilation policy.

Invigilators must be appropriately trained and checked to ensure there are no conflicts of interest and fully informed of the pre-test; during the test; post-test arrangements.

Procedures for handling paper-based tests should ensure security at all points and handling by named Centre personnel only. The use of paper-based testing must be carefully managed, and tracking of paper tests from issue to return must be logged in the management information system.

For apprenticeship assessments conducted by PAL, PAL will typically use PAL invigilators who are subject to the relevant regulatory conditions and PAL's associated policies and procedures. For the reformed apprenticeships, PAL recommends using PAL invigilators.

For qualifications, Centres are expected to undertake invigilation in accordance with this policy, PAL's invigilation policy and the Centre's relevant policies and procedures.

Cheating is malpractice and where proven will result in sanctions and likely non-validation of assessment results.

Preventing Cheating - Other Assessments - Centre Assessments

It is critical that any preparation for assessment, such as preparing for professional discussions or competency-based interviews and presentations, should draw from the Learner's/Apprentice's experience and understanding and allow them to showcase their talents and voice. Portfolio and project work has to be representative of the Learner's/Apprentice's activities and again allow them to showcase their experiences and skills, knowledge and understanding.

Permitting Learners/Apprentices sufficient time and resource to compile portfolio/project/report work is vital, cheating can sometimes occur where Learners/Apprentices have insufficient time to complete work and thereby take shortcuts. If a Learner/Apprentice needs additional support in providing evidence of competence in a specific format, please refer to the Centre's and PAL's reasonable adjustment policy and guide and our PAL quality team are always available to discuss reasonable adjustment requirements.

PAL provides a range of support materials that can assist Centres and Learners/Apprentices to prepare effectively for assessments and meet PAL's requirements for assessment integrity.

Preventing Cheating - Other Assessments - PAL Assessments

PAL's assessors and assessment process are as with Centres guided by relevant specifications, PAL's policies & procedures and regulatory conditions.

Appeals - Cheating - Centre Assessment

Please refer to section 7.1

Appeals - Cheating - PAL Assessment

Please refer to PAL's enquiry and appeals policy

Cheating - Reasonable Adjustments

Falsely requesting reasonable adjustments which unfairly confer an advantage on a Learner/Apprentice, which does not require such an assessment intervention or modification, PAL regards as form of cheating. Any such false requests, or requests where there is no contemporary evidence or requirement for the reasonable adjustment, PAL will sanction the appropriate parties and review the assessment results accordingly.

Any misuse of reasonable adjustments which confers an unfair advantage constitutes malpractice and must be treated as an Adverse Effect under Condition A8, requiring reporting to the regulator where applicable.

Use of AI

Please refer to PAL's AI guidance.

See Appendix Two for summary guidance regarding assessment conduct

8. Consequences of Plagiarism, Cheating and Collusion (to include the improper use of AI)

8.1 Consequences for Learners

Any Learner/Apprentice who is found guilty of plagiarism, collusion, or cheating through the assessment process is at risk of having their assessment outcome invalidated and will not be certificated for the qualification/apprenticeship undertaken (in cases where guilt has been established prior to the processing of Learner/Apprentice results).

PAL will decide as appropriate, on a case-by-case basis, as to whether any Learner/Apprentice found guilty will be given the opportunity to reattempt the relevant assessment. The level of Learner/Apprentice guilt will depend on the level of deception or the severity of case, for example, the extent of unreferenced and undeclared AI use (beyond the acceptable tolerance) and the level of cooperation with any investigation and levels of contrition shown.

Learners/Apprentices who have already been certificated prior to guilt being established (in cases where information has become available after certification takes place) will have their certificates revoked.

8.2 Consequences for Third Party & PAL Personnel

Any Assessor or IQA (PAL or Third Party) or any Third Party or PAL personnel who has been found to have colluded with any Learner(s)/Apprentice(s) with a view to aiding plagiarism or cheating through the assessment process will

be guilty of malpractice and will have sanctions imposed on them by PAL. The severity of the sanctions imposed will be dependent on the severity of the circumstances and at an individual level, PAL may request that named PAL personnel are prohibited from any further assessment or quality assurance work and ask for a full review of any previous decisions made by the individual(s).

PAL personnel will face sanctions, disciplinary action and in the most serious cases PAL may terminate contracts and service level agreements

Centre/Third Party and PAL personnel should be aware that PAL will also inform the relevant regulatory bodies of malpractice cases.

8.3 Consequences for Approved Centres & Centre Personnel

PAL approved Centres must be aware that if any Centre personnel, Assessors or IQAs operating at the Centre are found guilty of malpractice, then PAL will consider the application of sanctions. Sanctions could result in investigations of previous assessments, (at cost to the Centre), cessation of registrations or certification, or withdrawal of PAL services. The severity of the sanctions will be decided on a case-by-case basis and further details on the range of available sanctions can be found in PAL's Sanctions Policy.

The Head of Centre or named senior person as noted in the Service Level Contract and Centre Approval Declaration documents has ultimate responsibility for ensuring that malpractice does not take place, including the aiding and abetting of Learner/Apprentice malpractice by any Centre Personnel.

8.4 Adverse Effects

Plagiarism, collusion and cheating falls under maladministration and malpractice and if PAL suspects any such act, or we are advised of such activities by another person or party, and there are reasonable grounds for that suspicion or allegation, predicated on regulatory conditions, PAL will follow its investigative procedures.

Where such actions give cause to a potential or actual adverse effect, PAL will report such actions to the regulator and will expect all parties to participate in any subsequent investigation. Depending on the outcome of any such investigation, previous results, achievements, and certificates are subject to revocation and the regulator requires PAL to inform other AOs who may be doing business with the Centre or offer the same/similar qualifications or apprenticeships.

Please see PAL's Investigation Procedure regarding how PAL approaches investigations.

9. Reporting Acts of Plagiarism, Cheating, Collusion

Centre personnel who discover, or suspect any form of plagiarism, collusion, cheating and/or improper use of AI must report this to their Head of Centre, or the nominated Centre person who has sufficient authority and independence. Example roles could include Head of Quality, Quality Manager, Quality Director, Examinations Manager, Quality Lead, etc.

The Head of Centre is required to notify PAL of all allegations or incidents of plagiarism, collusion, cheating or misuse of AI, actual or suspected on discovery. PAL will agree with the Centre the investigation approach and whether the Centre can conduct the investigation, or whether PAL will take the investigation lead.

Investigations should be conducted in line with PAL's investigation procedure and PAL's Responsible Officer will be kept informed of the progress and outcomes of the investigation, and committee decisions where constituted. PAL's Responsible Officer will be responsible for notifying the regulator and keeping the regulator informed.

Failure to report incidents of suspected plagiarism, collusion, cheating or the improper use of AI as stated above may result in an application of a Centre sanction, and most likely change to the Centre risk rating and where DCS as been granted, this will be subject to a review and possible removal.

Any investigation report will include:

- The extent and scope of the incident.
- The personnel involved.
- The potential number of affected Learners/Apprentices, qualifications/apprenticeships, and results before reporting the event.
- Date(s) of submitted work.
- ULN (s) of the involved Learner/Apprentice or Learners/Apprentices.
- Employer Organisation (if applicable).
- Details of submitted work and evidence causing concerns (PAL will need access to this information).

The report should outline recommendations to prevent further occurrences. PAL will agree and confirm any sanctions and the status of Learners/Apprentices affected, taking into consideration any conditions set by the regulator and any history regarding previous performance of the Centre.

Where Centres make recommendations for sanctions in accordance with PAL's Sanctions policy, PAL has the right to overturn such sanctions and award a different level of sanctions, based on the evidence presented. Where PAL has permitted a Centre to undertake the investigation, but are not satisfied with investigation outcomes or process, PAL can undertake further investigations and reserves the right to charge the Centre for this work.

Where PAL undertakes the investigation, (to include investigations at Third Party Organisations and PAL personnel where required) this will be done in accordance with our investigation procedure and PAL will expect full co-operation from all parties involved and PAL's findings and recommendations will be final.

Whereas a result of an investigation the outcome is the withdrawal of a Learner/Apprentice from the qualification or standard they are working on, fees will not be refunded, and PAL's Responsible Officer will report to the regulatory body.

It should also be considered that employed Learners/Apprentices who are deemed to have perpetrated malpractice may also be subject to their own Employer's Staff Code of Conduct with, potentially, additional consequences that are outside of PAL's control.

Where an incident has the potential to cause an Adverse Effect, PAL will escalate the matter to the Responsible Officer immediately for review and consideration of regulatory notification under Condition A7.

10. Monitoring and Review

This policy is reviewed as a minimum on an annual basis

11. Regulatory References

PAL is required to establish and maintain compliance with regulatory conditions and criteria. This policy relates to Ofqual General Conditions of Recognition: Identification and management of risks A6; Malpractice and Maladministration A8.

Date Created: 6th June 2017

Last Review: 7th November 2025

Next Review: 7th November 2026

Person Responsible for review: Qualifications Director/ Business Operations Director

This Policy has been agreed by the PAL Board

Appendix One – Summary Guide for Centres/Third Parties for addressing Cheating, Plagiarism and Collusion

What Centres/Providers Must Do

1. Have a policy

You must have a plagiarism/cheating/collusion/AI policy that aligns with PAL's.

2. Educate Learners/Apprentices

You must ensure all Learners/Apprentices understand:

- What constitutes misconduct.
- How to reference properly.
- What is acceptable use of AI.
- Consequences of misconduct.

3. Ensure secure assessment conditions

- Follow PAL invigilation requirements.
- Follow any assessment & quality assurance requirements set by PAL.
- Use secure methods for sending/receiving assessment materials.
- Ensure assessment environments are suitable for the assessment being undertaken.

4. Check Learner/Apprentice work for authenticity

- Compare written work within Learner/Apprentice cohorts/groups/employer sites.
- Use plagiarism detection tools.
- Review projects/portfolios for unusual similarities.
- Check AI misuse indicators.

5. Report concerns to PAL on discovery

- Centres must notify PAL promptly where misconduct is suspected or confirmed.

6. Cooperate with PAL investigations

Centres/Third Parties must:

- Provide information requested.
- Retain records.
- Escalate internally to a Head of Centre/Quality Lead.
- Support outcomes, actions and sanctions.

Consequences of Proven Cheating, Collusion, Plagiarism

For Learners/Apprentices

- Assessment results invalidated.
- Failed result given.
- Certificates revoked where issued.

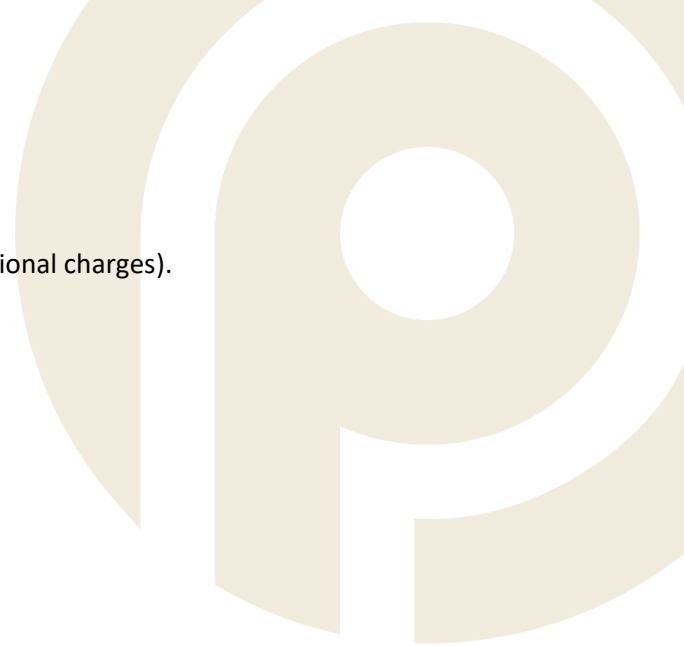
For Centre or Third Party Personnel:

- Suspension from assessment roles.
- Sanctions or removal of approval to work on named or all qualifications/apprenticeship standards.

(Note in EPA, Third Party personnel are not involved in assessments, so the imposition of sanctions by PAL in this setting is unlikely. PAL personnel are subject to sanctions, in the same way as any other personnel from Centres)

For Centres/ Third Parties

- Risk rating increase.
- Additional monitoring (PAL reserves the right to make additional charges).
- Withdrawal of approval.



Appendix Two - Assessment Protocols

Through the Learner/Apprentice assessment process for vocational/occupational qualifications to include apprenticeships, Learners/Apprentices are required to demonstrate that they have obtained and retained the knowledge, skills and ability required to satisfy the learning outcomes and assessment criteria of the qualification/apprenticeship they have been enrolled on.

Therefore, in order to be awarded any qualification/apprenticeship and in terms of assessment evidence, Learners/Apprentices are required to submit their own work and prove through this that they have gained the necessary knowledge, skills and ability required to merit the award of any qualification/apprenticeship and the issue of a qualification/apprenticeship certificate.

MCQs/Invigilated Exams

Learners/Apprentices undertaking any MCQ/SJT examination/test assessment (including through e-Assessment, remote assessment, and proctoring) or any form of examination must have received appropriate instruction and guidance, understand if they are eligible for reasonable adjustments and be able in a text assessment to answer questions independently under appropriate invigilation.

All parties must accept that any answer provided by the Learner/Apprentice, must be their own and given independently with no assistance, beyond what is permissible within the qualification/apprenticeship specification and relevant policies, such as invigilation and reasonable adjustment policies and procedures.

If it is identified that any answers submitted by Learners/Apprentices as their own work have been obtained from another source (e.g. another Learner/Apprentice or Trainer, on-line resources) either prior to or during the assessment process, then this will be considered as either plagiarism, cheating and/or collusion and will result in the assessment outcome being invalidated.

Any Centre, Trainer/Assessor or IQA, or PAL personnel that is found guilty of providing answers to Learners/Apprentices for the purposes of submission are likely to have high level sanctions imposed upon them by PAL, as may the Learner(s)/Apprentice(s) involved, and they will be subject to an event notification to the relevant regulators. PAL personnel will face disciplinary action and or service level agreements will be terminated.

Practical Assessments

Learners/Apprentices undertaking practical assessments are required to demonstrate specific skills they have obtained through course delivery. In terms of assessment evidence, Learners/Apprentices must carry out the practical tasks being assessed:

- As instructed by the assigned assessor.
- Under the applicable assessment conditions (which should be explained by the assigned assessor).
- Of their own accord.
- Without obtaining any assistance from any other third party to carry out the practical tasks required.

The assessment must be viewed by the assigned Assessor who is then required to pass judgement on whether or not the level of skill demonstrated by the Learner/Apprentice merits the award of a pass. Where the qualification/apprenticeship specification requires the Trainer and Assessor to be different people, the Centre must adhere to this requirement.

If any evidence comes to light which confirms that any Learner/Apprentice was illegitimately given any assistance to carry out a practical task assessed but was still awarded a pass by the assigned Assessor, then the assessment outcome will be invalidated, as this will be considered to be collusion/cheating. Similarly, if any evidence confirms that a Learner/Apprentice undertook a practical assessment and could not demonstrate the necessary skills to merit

a pass but was awarded such by the assigned Assessor regardless, then the assessment outcome will be invalidated. Again, PAL is likely to impose sanctions on any Centre, Trainer/Assessor IQA or any PAL personnel that is found guilty of such activity.

Learner/Apprentice Workbooks, Written Work and Portfolios

Learners/Apprentices who are required to submit completed workbooks, written work, or portfolios of evidence as part of the assessment process for any qualification/apprenticeship must ensure that the answers and/or evidence they submit in the workbooks are their own work and in their own words. In doing this, Learners/Apprentices will demonstrate that they have the knowledge, skills and understanding required to pass assessment.

Learners/Apprentices who use academic sources (e.g. books, websites) to demonstrate the knowledge required to pass assessment should reference the sources appropriately.

Please refer to PAL Guidelines to Referencing in this policy

If any Learner/Apprentice does not make appropriate references to the sources used to formulate assessment answers, then this will be considered as plagiarism, and their assessment outcomes will be invalidated.

Learners/Apprentices will also be considered guilty of plagiarism if it has been identified (using suitable, widely available software) that it is highly probable that they have used Artificial Intelligence (AI) to generate assessment answers which have been submitted as their own work. Please refer to PAL's AI guidance.