



Sanctions Policy

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Policy Review

Version	Date	Change History	Reviewed By	Implementation Date:	Next Review Date
7	7 th December	Combining of policies to a new combined version	QD and BOD	9 th December 2025	9 th December 2026

1. Overview

Professional Assessment Ltd (PAL) is an Ofqual-regulated awarding and apprentice assessment organisation (AO) and end-point assessment organisation (EPAO). PAL must ensure that all assessment and awarding activities—whether delivered directly by PAL (EPA model) or through PAL Centres (AO model)—are undertaken in a way that maintains the integrity, validity, reliability and fairness of qualifications and apprenticeship assessments.

This combined Sanctions Policy sets out:

PAL’s approach to sanctions for both **Centres** (AO context) and **Third Parties** (EPA context).

- How PAL safeguards assessment integrity and manages non-compliance.

- The different sanction pathways depending on the role and responsibilities of the organisation or individual involved.
- The actions PAL may take to mitigate and correct actual or potential Adverse Effects.

This policy replaces previous separate versions and provides *a single, harmonised policy framework* covering all regulated activities.

PAL's approach is grounded in Ofqual's Conditions of Recognition, in particular: A6, A7, B7, C1, C2, G1, G8, G9, H1, H2, H5, H6, I4, and EPA conditions where relevant.

Every attempt has been made to align the provisions of this document with the relevant regulatory body requirements and any other associated principles issued by relevant agencies such as Skills England. Where the requirements of a regulatory body change, or where inadvertently these procedures conflict with that of the regulatory authority, the latter shall apply.

Where the requirements of the regulatory authority are amended and require changes to this document, such changes will be made as soon as practically possible, and PAL will inform its stakeholders (Centres and third parties) accordingly.

Additionally for PAL personnel there is a specific suspension and sanctions policy which outlines where individual sanctions can and will be applied for misconduct by PAL personnel.

Note the term Provider as used in this policy can refer to Training Providers and or Colleges.

2. Policy Scope

This Policy applies to Centres and Third Party Providers and Colleges

This policy must be read alongside:

- Maladministration & Malpractice Policy
- PAL Investigation Procedure
- Risk & Incident Management Policy
- Appeals & Enquiries Policy
- Centre Agreement (AO) or Service Level Contract (EPA)
- Withdrawal Policy
- Conflict of Interest, Complaints, Whistleblowing, Plagiarism & Cheating Policies

A "Centre" is any organisation approved by PAL to deliver any aspect of PAL's regulated qualifications or permitted to assess apprenticeship standards on PAL's behalf, including assessment administration, invigilation¹, marking (where applicable), IQA, and data submission.

For EPA activity, a "Third Party" includes:

- Independent Training Providers (ITPs)
- Colleges
- Employer-providers
- Employers supporting apprentices

See appendix one for further information regarding PAL's interpretation of Ofqual's interpretation of Third Party Providers and Centres.

¹ Note PAL currently invigilates all test under the EPA regime and under Centre approvals, PAL as a minimum will act s the invigilator for the parent centre

3. Who Is This Policy For?

This policy is for:

- PAL Centres approved to deliver qualifications
- Third parties engaged in EPA activity
- Employers and providers supporting apprentices
- Apprentices, learners, Centre staff and employer/ITP staff
- PAL personnel and associates and consultants who design, develop, deliver, quality assure or award qualifications or EPA

4. Purpose

Professional Assessment Ltd (PAL) needs to make sure that the Centres, third parties and relevant stakeholders (to include employers, providers, and learners/ apprentices) we work with, take all reasonable steps to guarantee that PAL can comply with the regulatory requirements associated with Apprenticeship standards and qualifications.

The purpose of this policy is to:

- Protect the integrity of PAL's qualifications and apprenticeship assessments.
- Ensure compliance with Ofqual regulations for qualifications and apprenticeship assessments and EPA requirements.
- Ensure that PAL applies sanctions consistently, proportionately and transparently.
- Describe how PAL responds when any party fails to meet PAL's requirements.
- Detail the range of sanctions and when they may be applied.
- Ensure PAL fulfils its regulatory responsibilities by mitigating and correcting potential or actual Adverse Effects.
- Set out how PAL will enforce the terms of our service level contracts and enforceable approval agreements with entities and their personnel

PAL's Suspension and Sanctions policy and procedure details how PAL will apply sanctions to PAL personnel, the same conditions and requirements are applied to PAL personnel.

5. Regulatory Requirements

The Sanctions Policy is designed to fulfil the requirements of our regulators. In particular Ofqual's General Conditions:

- A6** Identification and management of risks.
- A7** Management of incidents.
- B7** Compliance with Regulatory Documents.
- C1** Arrangements with third parties.
- C2** Arrangements with Centres.
- G1** Setting the assessment.
- G8** Completion of the assessment under the required conditions.
- G9** Delivering the assessment.
- H1** Marking the assessment.
- H2** Moderation where an assessment is marked by a Centre.
- H5** Results of a qualification must be based on sufficient evidence.

This policy is also aligned with PAL's Risk & Incident Management Policy, which define PAL's approach to identification, escalation and reporting of risks and incidents.

6. Definitions

6.1 Sanctions

A formal action applied by PAL to a Centre, Third Party, individual, apprentice or learner to prevent, mitigate or correct non-compliance or risk, and to safeguard assessment integrity, sanctions can be applied separately or in a combination, for example proven cheating by a group of learners, due to weak test invigilation means PAL can

impose sanctions on the individual learners, those conducting the invigilation and potentially a centre or Third party Provider, or a team, or department within those organisations.

Sanctions are actions typically taken to influence conduct and prevent further occurrences of behaviours that undermine assessment integrity.

6.2 Adverse effect

“An act, omission, event, incident, or circumstance has an Adverse Effect if it:

- (a) Gives rise to prejudice to Learners or potential Learners; or
- (b) Adversely affects –

- I. The ability of the awarding organisation to undertake the development, delivery, or award of qualifications/assessments in accordance with regulatory requirements,
- II. The standards of qualifications/apprenticeships which the awarding/ assessment organisation makes available or proposes to make available, or
- III. Public confidence in qualifications /apprenticeship standards”.

6.3 Transgression

Any action that breaches a PAL policy, Centre Agreement, EPA Service Level Contract or regulatory requirement.

6.4 Penalties

Penalties are a consequence or disadvantage attached to an action or condition. If the assessments of a qualification, apprenticeship or the associated quality assurance procedures are compromised and a breach of policy or regulation has occurred, PAL will apply sanctions.

7. Organisational Responsibilities

7.1 Awarding/Assessment Organisation

PAL is responsible for:

- Monitoring Centre and Third-Party compliance
- Identifying risks
- Managing incidents
- Undertaking investigations
- Applying sanctions proportionately
- Ensuring regulators are notified promptly where required

PAL is responsible for monitoring compliance within PAL, Centres and Third Party Providers/Colleges and taking appropriate action when non-compliance is suspected or known not to be the case. The risk status given to organisations will influence the level of monitoring². Risk status for Centres is set pre-approval and undertaken by the Quality team with PAL Director oversight and monitored subsequently through EQA activities. Third Party Provider/College risk status is determined as part of the contracting process and monitored via Assessment/Account management activities

PAL assessment and quality assurance activities conducted by PAL personnel are monitored through RAG rating, sampling, quality assurance activities, checks regarding for examples conflict of interest, contracts and service level agreements that extol the requirements for professionalism, confidentiality and compliance to policies and line management monitoring of personnel.

Review and evaluation activities support risk intelligence and includes the monitoring of complaints, enquiries and appeals and maladministration and malpractice.

² For EPA work Third Party Providers/Colleges and employers have limited involvement in any aspect of assessment from planning to requesting certification, so whilst there are opportunities for non-compliance and sanctions can be imposed, the probability of non-compliance is minimal

Should PAL or any party involved in the design, development, delivery or award of qualifications and/or apprenticeship assessments fail to meet its obligations, including those relating to the notification of adverse effects and in relation to malpractice and maladministration, PAL is required to notify the relevant regulators.

PAL is also required to notify the relevant regulator where it applies sanctions as outlined in this policy and notification can include advising other AOs of such sanctions, to ensure they can safeguard their own awarding and assessment provision.

7.2 Centres

Centre responsibilities include:

- Complying with the Centre Agreement
- Ensuring accurate assessment, IQA, record keeping
- Preventing malpractice/maladministration
- Implementing corrective actions

The Centre must ensure that all staff involved in the management, assessment, and quality assurance of PAL qualifications/apprenticeships, and Learners/Apprentices taking these qualifications/apprenticeships are fully aware of the contents of the policy and the possible consequences if the Centre, an individual member of staff, contractor or registered Learner/Apprentice fails to comply with the requirements specified by PAL in relation to the delivery of its qualifications/apprenticeships.

The Centre Agreement and approval declaration, supported by the PAL Centre Handbook and Centre Assessment and Quality Assurance guide sets out the specific duty not to put the awarding/assessment organisation in breach of its ability to fulfil its regulatory obligations. It is therefore important that possible and actual adverse effects and suspected or actual malpractice and/or maladministration are notified to PAL immediately and dealt with in line with the relevant policies and procedures.

7.3 Employers, Apprentices Providers, Third Parties responsibilities (EPA)

Third Parties (EPA) responsibilities include:

- Providers, employers and other organisations must:
- Comply with the EPA Service Level Contract
- Submit accurate gateway evidence
- Follow PAL assessment administration requirements
- Co-operate with investigations

PAL requires Employers, Providers and Third Parties to comply with the terms and conditions outlined in PAL's service level contracts, the assessment (EPA) manual, and any other guide or information that details acceptable practice and ensures valid, reliable, and consistent and comparable assessment.

Providers and Employers have a responsibility to deliver a meaningful and relevant Apprenticeship offer and should apply their quality assurance policies and procedures to deter any form of poor practice and maintain the integrity of the Apprenticeship standard and programme.

Apprentices are expected to follow their training programme requirements for the in-programme delivery, as set by their training provider/college and employer, and be familiar with the Apprenticeship standards and assessment plan, for which they are enrolled. For assessment, where PAL is the selected EPAO/ AO, as with Providers and Employers, Apprentices should take time to review PAL's policies, accessed via our website, or on-line resources library.

Responsibilities of Employers, Providers, and Apprentices include ensuring evidence requirements for gateway and assessment are adhered to and correlate with the named apprenticeship standard. This requirement extends to portfolio evidence (for those standards which utilise a portfolio as part of the assessment, either as an assessment instrument, or where it underpins another assessment, for example a professional discussion).

8. Personnel Roles and Responsibilities

8.1 Heads of Centre

- Ensure Centre staff and Learners/Apprentices understand the consequences of transgression.
- Implement assessment activity and quality assurance activities that comply with PAL's requirements.
- Carry out corrective actions imposed by PAL to maintain compliance with PAL's Centre approval criteria.
- Ensure the Centre has a mechanism of identifying transgressions and making the appropriate corrections.

8.2 Heads of Third Party Provider/Employer

- Ensure Third Party staff and Learners/Apprentices understand the consequences of transgression.
- Implement formative assessment activity and quality assurance activities that comply with PAL's requirements.
- Carry out corrective actions imposed by PAL to maintain compliance with PAL's Service level contract.
- Ensure the Third Party has a mechanism of identifying transgressions and making the appropriate corrections.

8.3 Centre IQAs and Assessors/Trainers

- Read and comply with this policy and comply with the qualification/apprenticeship assessment and quality assurance requirements as specified by PAL.
- Ensure Learners/Apprentices are aware of the conduct expected of them and the penalties they could face, if they transgress.

8.4 PAL's External Quality Assurers (EQAs)

- Following EQA activities to include support visits, sampling and EQA monitoring and scrutiny, based on evidence seen, make recommendations to PAL regarding necessary sanctions that may be applied to a Centre.
- Provide appropriate information and evidence to enable PAL'S Qualifications Director (Responsible Officer) in conjunction with the Business Operations Director and Quality Manager to make the final decision on the sanction (and sanction level) that will be applied.

8.5 Third Party IQAs and Assessors/Trainers

- Read and comply with this policy
- Ensure formative assessment activities support assessment readiness and accurate gateway submissions to PAL
- Ensure Learners/Apprentices are aware of the conduct expected of them and the penalties they could face, if they transgress.

8.6 PAL Assessors

- Read and comply with this policy
- Undertake assessments in accordance with the prescribed assessment plan, PAL's specification and assessment guidance and timelines for recording and reporting assessment outcomes
- Respond promptly to any IQA feedback
- Report any incidents or concerns regarding assessment viability, security, accessibility and authenticity promptly

8.7 PAL's Quality Team

- Ensure the policy it is implemented fairly and consistently across PAL's approved Centres, third Party Providers PAL Assessors.
- Monitor progress of approved Centres where sanctions have been imposed and instruct PAL QD and BOD where further sanctions may be applied, and/or where sanctions can be downgraded or lifted.
- Monitor PAL assessor work through RAG rating reviews and report any concerns that may require the use of PAL's suspension and sanctions policy.

8.8 PAL's Qualifications Director and Business Operations Director

- In conjunction with the Qualifications Director, compile, review, support and implement the sanctions policy and all policies associated with managing centre/ Third Party Provider and PAL risk management.
- Review and update the sanctions policy as required
- Advise and update the Quality Standards Committee, Quality and compliance group and the Board of any planned or imposed sanctions
- Oversee any implement any risk mitigation activities
- Ensure the maintenance of PAL's governance logs

8.9 PAL's Responsible Officer

- Oversee sanctions applied to Centres and Third Party Providers
- Advise Directors and Board of required risk mitigation activities
- Undertake notifications and communications with the relevant regulators

8.10 PAL Board

- Overall responsibility and accountability for this policy and the maintenance of PAL's risk identification, monitoring and mitigation activities.

9. Difference Between Centres and Third Parties

Requirement	PAL Centres (AO)	PAL Third Parties (EPA)
Contractual Basis	Centre Agreement to include enforceable approval declaration	EPA Service Level Contract
May administer assessments	Yes (invigilation, test delivery, some marking if permitted, typically electronic marking overseen by PAL) Note parent centre PAL will invigilate and mark tests	Limited: may host i.e. provide room, IT equipment but no invigilation or marking
Responsible for IQA	Yes	Yes EPA specific and for PAL assessments for reformed apprenticeships, where PAL has undertaken the assessment
Gateway submission	N/A	Yes
Assessment administration	Yes (note for reformed apprenticeships, assessment administration can be split between Centre and AO)	Yes
Sanctions likely to include	DCS removal (where DCS permitted and granted), suspension of registration/certification, Centre withdrawal	Suspension of gateway registrations, removal of support activities, EPA contract review and withdrawal.
Regulatory Basis	C2	C1

See appendix Two for further comparison between a Centre and Third Party

10. Approach to Sanctions

PAL may impose sanctions to:

- Protect assessment integrity
- Allow time for investigation
- Prevent or mitigate Adverse Effects
- Protect learners/apprentices
- Safeguard public confidence

Sanctions may be applied to:

- Centres (AO)
- Third Parties (EPA)
- Individual staff members (Centre/Third Party)
- Apprentices/Learners
- PAL personnel (separately covered in the internal Suspension & Sanctions Policy)

Sanctions may be issued:

- Following an investigation
- Following EQA/EPA monitoring
- Where evidence is uncontested
- Where risk is identified

10.1 PAL's approach to sanctions for PAL

The different contexts of EPA and Qualification and reformed apprenticeship delivery influences the nature of a relationship PAL has with organisations such as Providers and colleges, and PAL's approach to risk management and monitoring.

With EPA, PAL in effect acts as a 'centre' and an AO and has direct control and involvements with all aspects of design, development, delivery and award, and whilst this gives PAL a high degree of control and assurance over the validity and reliability of results, it conversely means PAL presents the highest risk. PAL's risk and incident management therefore through a range of policies and procedures has a series of checks and balances to prevent non-compliance.

Sanctions are an integral element of risk management, as they are designed to firstly act as a deterrent to wrong doing and secondly make transparent what PAL will do where non-compliant behaviour is detected and PAL applies the same approach to sanctions, regardless of the individual or entity. PAL holds itself to the same rules and requirements we expect from Centres and Third Party providers and colleges and stakeholders in general.

10.2 PAL's approach to sanctions for Centres

PAL aims to work with its approved Centres in a supportive way. If a need for improvement in Centre practice is identified, PAL will work with the Centre to make those improvements, usually through the implementation and monitoring of an action plan. Whilst this approach aims to prevent situations arising which would warrant the need for sanctions, failure to address the actions adequately may make this necessary.

All Centres recognised by PAL are required, as a condition of Centre approval, to sign a service level contract and approval declaration Centre between themselves and PAL prior to delivering its qualifications/apprenticeships, and to comply with the agreement at all times. Compliance is monitored by PAL's Quality team, through EQA Centre monitoring activities.

PAL can apply a sanction as a result of EQA feedback and reporting, as a result of an investigation, where evidence of non-compliance is uncontested or where a risk is identified, this can include a financial risk such as later or delayed payments.

Centres are informed in writing by PAL's Quality Manager that a sanction is being applied, this will be issued after dialogue with the Head of Centre or persons of authority within the organisation. The Centre must implement corrective actions to remove the risk identified within the timescales specified by PAL. Progress will be monitored. The Centre will be made fully aware of the likely outcomes should the corrective actions not be satisfactorily addressed within the required timescales.

Sanctions will be reduced or lifted when the corrective action has been completed, and PAL is satisfied that the level of risk is reduced. Should the corrective action(s) not be completed satisfactorily, PAL reserves the right to escalate the level of sanction according to the level of risk identified. This could result in the withdrawal of PAL's Centre approval, meaning the Centre would no longer be able to offer qualifications/apprenticeships through PAL.

Sanctions may be applied to individual staff within Centres, and/or the Centre as a whole. Sanctions may also be applied to Learners/Apprentices.

See appendix Three for further information regarding EQA activity and Centres and Sanctions

10.3 approach to sanctions for Third Party Providers/Colleges

PAL aims to work with Third party Providers/Colleges and associated employer clients in a professional and supportive way, and we do this through our assessment/account management activities.

All third party Providers/Colleges wishing to work with PAL as an EPAO are required to sign a service level contract with PAL, before PAL will accept any apprentice registrations, the contract, along with documents such as the EPA manual requires them to comply with the terms and conditions at all times.

Where a third party fails at any point to meet the terms and conditions of the contract, PAL reserves the right to consider sanctions. Compliance is monitored through PAL's assessment and quality assurance activities, data analysis, assessment/account management activities and stakeholder feedback.

PAL can apply a sanction as a result of PAL IQA feedback and reporting, as a result of an investigation, where evidence of non-compliance is uncontested or where a risk is identified, this can include a financial risk such as later or delayed payments.

Third Party Providers are informed in writing by PAL's Business Operations Director that a sanction is being applied, this will be issued after dialogue with the signatory of the service level contract or persons of authority within the organisation. The Third party Provider/College must implement corrective actions to remove the risk identified within the timescales specified by PAL. Progress will be monitored. The Third party provider/College will be made fully aware of the likely outcomes should the corrective actions not be satisfactorily addressed within the required timescales.

In any situation where there is concern about the ability of a Centre or Third party Provider/College to meet the terms and conditions of their agreements quality assurance requirements or financial obligations then PAL will review the risk status of the organisation to ascertain if the risk rating needs to be amended.

Any investigation into non-compliance will generally take between ten working days and three months by PAL. Please note that this may take longer, subject to the issues being investigated. All relevant parties will be kept fully informed regarding the duration of the investigation by regular updates provided at least monthly. The cost of any investigations can be passed to the Centre or Third Party and are non-refundable.

PAL only applies sanctions:

- To minimise the risk to the integrity of all aspects of our awarding functions, specifically in relation to the awarding of results and certificates, or validation of apprenticeship certificates.
- To ensure the integrity and veracity of certificates we may award.
- To allow us, and potentially other awarding organisations where relevant, time to investigate potential maladministration and/or malpractice whilst maintaining the integrity of the qualification(s)/ apprenticeship(s) involved.
- To protect our business and your business

11. Sanctions Levels and the Sanctions Process

PAL can apply sanctions at either an individual, team, department, qualification/apprenticeship standard, or organisational level, or in specific cases at cohort level, or at employer organisation level. PAL will determine the appropriateness of the sanction(s) to be applied, depending upon the evidence available.

When inadequate action has been taken by the Centre/Third Party in response to a sanction, PAL may increase the sanctions imposed. Persistent inadequate action may result in the withdrawal of approval.

11.1 Sanctions Levels

➤ **Level 1 — Low Risk / Minor Non-Compliance**

➤ Examples:

- Minor administrative errors
- Minor data inaccuracies
- Occasional failure to follow procedures

➤ **Sanctions may include:**

- Verbal warning
- Written warning
- Action plan (10 working days – 3 months)
- Temporary suspension of non-critical activities



➤ **Level 2 — Moderate Non-Compliance / Emerging Risk**

➤ Examples:

- Repeated administrative errors
- Delayed gateway submissions (EPA)
- Late registration/certification requests (AO)
- Partial failure to comply with contract
- Unresponsiveness to actions

➤ **Sanctions may include:**

- Risk rating increased
- Additional EQA/EPA monitoring (chargeable)
- Temporary suspension of gateway submissions (EPA)
- Temporary suspension of certification (AO)



➤ **Level 3 — Significant Non-Compliance / Loss of Integrity**

➤ Examples:

- Assessment administration failures

- Data inaccuracies affecting results
- Risk of invalid claims
- Non-compliance with assessment plan (EPA)
- Serious delays or financial risk

- **Sanctions may include:**

- Suspension of registrations (AO)
- Suspension of EPA activities (EPA)
- Removal of invigilation approval
- 100% sampling of assessment evidence
- Immediate payment terms



- **Level 4 — Severe Non-Compliance**

- Examples:

- Breakdown of assessment systems for specific sites/standards
- Abuse of reasonable adjustments
- Insecure assessment handling

- **Sanctions may include:**

- Removal of approval for specific qualifications, standards or sites
- Notification to regulators
- Withdrawal of invigilation rights
- 100% IQA/EQA sampling



- **Level 5 — Critical Failure**

- Examples:

- Breakdown of all assessment arrangements
- Widespread malpractice
- Falsification of records
- Repeated breach of contract

- **Sanctions include:**

- Withdrawal of Centre approval (AO)
- Termination of EPA contract (EPA)
- Regulator notification
- Certification invalidation where required

11.2 Process for Applying Sanctions

1. Decisions relating to the imposition of sanctions are reviewed by the appropriate PAL personnel, post an investigation or in cases where the evidence is unequivocal or not contested and discovered as a result of EQA/IQA activities or reported by the Centre/Third Party itself a sanction can be applied without the need of any further investigation, although PAL may still wish to undertake an investigation to determine the full scale of any Centre misconduct.
2. PAL will apply the sanction and notify the Head of Centre / Third Party nominated person and/or other relevant Centre/Third Party staff and where applicable employers and Learners/Apprentices in writing providing:
 - Details of the sanction being applied.
 - The reason for the sanction (including any related investigation).
 - The terms of the sanction, (e.g. date, length, qualification/apprenticeship/unit affected).
 - Any action the Centre or any individual must take as a result of the sanction, together with a timescale for the action.
3. PAL may notify the relevant regulator(s) and other awarding organisations of the sanction imposed. The need to do so usually occurs when the sanction relates to suspected or proven malpractice or maladministration.
4. If a Centre/Third Party disagrees with the decision, it may wish to appeal against it or lodge a complaint, in doing so the Centre/Third Party must be able to refute or demonstrate that PAL's application of sanctions is unreasonable and based on erroneous or incomplete evidence. If the Centre/Third Party has additional evidence that was not made available or considered as part of the investigation or review, they must make this available as part of the appeal.
5. Failure to comply with a sanction is likely to result in further, more punitive sanctions being imposed and an escalation of the sanction.
6. If the matter remains unresolved PAL may withdraw qualification/apprenticeship approval and ultimately Centre approval status, gateway referrals, suspend EPA assessments and terminate contracts, as applicable to the risk and sanctions already in place.
7. PAL will take steps to ensure that any Learners/Apprentices affected by a particular sanction, where they have no direct involvement and are not the subject of a sanction are adequately supported at all stages of the assessment/awarding process.
8. The outcome of a sanction review and any further investigations of the Centre may lead to a modification of any sanction to a less or more severe one, or to its removal.

At any stage in the process and at its conclusion PAL may update the relevant regulator(s) and any awarding organisations who were alerted to the sanctions when applied

12. Individual Sanctions

12.1 Sanctions Against Individuals

Centre Staff (AO) & Third Party Staff (EPA)

May include:

- Written warning
- Special conditions
- Mandatory training
- Suspension from assessment roles
- Permanent ban from EPA/AO activity

Individuals Attempting to Circumvent Sanctions

This will be treated as malpractice and may escalate sanctions.

12.2. Sanctions Against Apprentices/Learners

Depending on evidence and severity:

- Written warning
- Disqualification from a unit
- Disqualification from EPA series
- EPA halted and fail awarded
- Certification invalidated/revoked

PAL will notify all relevant parties.

12.3 Sanctions against PAL personnel

- Please refer to PAL's Suspension and Sanctions Policy

Please refer to appendix Four for examples of sanctions applied to individuals

12.4 Sanctions- Follow up Action

Imposed sanctions will remain in place until such time that either:

- The matter has been resolved to PAL's satisfaction.
- Investigation into the issue(s) is complete and PAL is assured there is no longer a threat to the integrity of its awarding functions.
- An appeal has been successfully upheld.

Please note that we may agree to reduce the sanction applied as a result of the above, but PAL equally reserve the right to maintain a sanction (or escalate the sanction level based on further information identified) to protect the integrity of its awarding functions, and assessment activities based on risk.

13. Sanctions Organisations

Please see appendix Five for examples of sanctions for Centres and Third Parties entities.

Sanctions follow-up will follow the process as identified in section 12.4

PAL has provided a summary overview of our sanctions policy in appendix six, please note this does not replace the full policy but is available as a guide.

14. Notifications to Regulators, Agencies and Other AOs

14.1 Notification to Regulators and Other Agencies

PAL must notify:

- Ofqual immediately where any sanction relates to a potential or actual Adverse Effect
- Other AO/EPAOs where appropriate
- Government bodies/ agencies could include (DfE, Skills England, DWP)

Regulators expect notification **on discovery**, not on completion, of an investigation.

PAL is required to share certain information relating to the imposition of sanctions with other Awarding Organisations. This may impact upon a Centre's ability to deliver qualifications/apprenticeship assessment with other Awarding/Assessment Organisations.

14.2 Notifications from Regulators and other Awarding Organisations

In cases where PAL is informed of sanctions imposed by a regulator and/or another Awarding Organisation or Stakeholder on Centres it is also working with, PAL will take appropriate action to check the Centre's current activity, its quality assurance performance to date, undertake a Risk Assessment based on the information provided, and where appropriate, make arrangements to increase PAL's monitoring of the Centre to ensure that the award of credit of PAL's qualifications/apprenticeships/units is sound and safeguarded.

14.3 Dormant Centres

A dormant Centre is defined as one that has paid its annual Centre fee but:

- Does not register any Learners within 12 months of becoming approved, OR
- Has had registrations and completions but then has no registered Learners for a period of 6 months, OR
- Has notified PAL that it is to make no registrations within the next few months.

In all the above cases, PAL may place a suspension on registration and certification.

In order to return to Approved status, the following actions will be taken:

- A request will be received by PAL from the Centre to go live (again). This will be logged with PAL's Quality Manager (QM).
- PAL's QM will assign an EQA, and Centre visit will be arranged within 4 weeks of the request to go live.
- If the Centre has been dormant for longer than 12 months, PAL's Business Operations Director (BOD) will ask for a credit check to be instigated by the Finance Team. The result of the credit check will be notified to the BOD who will decide whether the dormant status can be lifted. If the credit check causes concern, PAL's Quality Manager will be instructed to contact the Centre to inform them that due to an adverse credit check their request has been refused. The Centre will be notified of PAL's Appeals Policy.

If the BOD decides that the dormant status can be lifted, they will notify PAL's QM who will assign an EQA.

The EQA will conduct a Centre visit (which may be virtual). This will review any actions from the previous Centre visit and ensure that there are sufficient staff and resources in place to run the planned qualifications/apprenticeships. Further actions may be applied. If the EQA report is satisfactory, PAL's QM will advise the QD and BOD, and the sanction will be lifted.

If the EQA report is unsatisfactory the QM will advise the QD and BOD and, the Centre will be advised that the sanction remains in place.

14.4 Withdrawals

Centre/ Third Party Withdrawal

Centres/Third Parties must inform PAL of any intention to cease to be a Centre or withdraw from their contract. Organisations with such intentions must ensure that Learners/Apprentices are not disadvantaged through such a

decision and are supported to claim any unit certification, qualification, apprenticeship to which they may be entitled.

Withdrawing Centres/Third Party Provider/College must remove any reference to PAL and the use of the PAL logo from their websites and literature, including publicity and delivery materials. Action will be taken against any Organisation displaying a PAL logo which is not approved by PAL, which may include reporting to relevant regulatory authorities.

15. Recording Sanctions & Governance Oversight

PAL records all sanctions in its governance system.

Reports are reviewed by the:

- Responsible Officer
- Qualifications Director
- Business Operations Director
- Quality and Compliance Group
- PAL Board and Quality and Standards Committee

Sanctions inform:

- Risk management interventions
- Quality improvement activity
- Monitoring schedules

16. Appeals

All parties have the right to appeal sanctions using PAL's Enquiries & Appeals Policy.

17. Monitoring and Review

PAL will review this policy as a minimum on an annual basis.

18. 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; Management of incidents A7; Compliance with Regulatory Documents B7; Arrangements with third parties C1; Arrangements with Centres C2.

Date Created: 29th November 2020

Last Review: 09th December 2025

Next Review: 09th December 2026

Person Responsible for review: Business Operations Director and Qualifications Director

This Policy has been agreed by the PAL Board

Appendix One PAL's interpretation of a Centre and Third Party Provider/College

The following chart summarises the PAL interpretation of the Ofqual conditions:

It should be noted that PAL in EPA acts as the sole assessor and invigilator, which includes the administration of assessment. Sanctions can still be applied to Apprentices, Employers, and Providers, that PAL would regard as valued stakeholders and clients, but whom have no direct involvement in any aspect of end-point assessment.

Activity	Detail	Who is present	Ofqual Definition
Invigilation	An employer/Provider is involved in the invigilation of an assessment, but not involved in assessment decisions or marking	Without a PAL representative present	Centre
		With a PAL representative present	Third Party
Delivery	<p>An employer/Provider is involved in the administrative delivery of the assessment but not involved in assessment decisions or marking. For example:</p> <ul style="list-style-type: none"> taking delivery of written question papers in advance of the assessment, handing out written question papers to Learners, setting up online assessments, delivering instructions to Learners before the assessment commences, ensuring that the awarding organisation's rules in relation to the conditions under which the assessment is taken are adhered to, including Invigilation, and collecting written responses to assessment and sending to the awarding organisation. 	Without a PAL representative present	Centre
		With a PAL representative present	Third Party
Marking	An employer/Provider is involved in marking and making assessment judgements. Please note it has been PAL's stance not to use Employers or Providers personnel to undertake any form of marking or grading.	Without a PAL representative present	Centre
		With a PAL representative present	Centre
Premises	An employer/Provider is providing assessment premises, but is not involved in assessment invigilation, administration, or assessment / marking	n/a premises provision only	Third Party

Appendix Two 1. Key Differences Between Centre Sanctions (AO) and Third-Party Sanctions (EPA)

PAL operates two distinct regulatory environments:

A. Centres (Awarding Organisation qualifications)

Centres have formal *approval* and *recognition* status under Ofqual **Condition C2** and must meet AO requirements for qualification delivery. Sanctions relate to failures in administering PAL qualifications.

Key characteristics:

- Centres may administer assessments (e.g., invigilation, test delivery, IQA) and in some qualifications may mark assessments.
- Centres may have **Direct Claims Status (DCS)**³ risks, approval criteria, and Centre Agreement obligations.
- Sanctions directly affect qualification delivery—e.g., suspension of registrations/certifications, removal of Centre approval.
- Sanctions are linked to AO compliance requirements (C2), assessment conditions (G1–G9), and marking responsibilities (H1, H2, H5).

Types of sanctions typically applied to Centres:

- Suspension of registrations/certification
- Removal of DCS
- Increased EQA monitoring
- Restriction/removal of invigilation approval
- Withdrawal of approval for specific qualifications or all provision
- Centre closure/withdrawal

These sanctions protect qualification integrity and the AO's regulated status.

B. Third Parties (EPA Providers/Employers)

Third Parties are not delivering qualifications on PAL's behalf. They are partners in the EPA ecosystem but *not Centres*. Their role is to support gateway, provide assessment premises or administrative support, and follow the EPA Service Level Contract.

Key characteristics:

- Third Parties **do not conduct marking**, IQA, or qualification assessment. PAL undertakes *all* assessment decisions for EPA.
- Sanctions relate to failures in gateway, evidence integrity, admin support, and assessment environment.
- Third-party obligations fall under Ofqual **Condition C1** (arrangements with third parties).
- Sanctions generally affect EPA process flow (e.g., gateway suspensions) rather than qualification delivery.

³ Note for apprenticeships DCS status is not applicable

Types of sanctions typically applied to Third Parties:

- Suspension of gateway submissions
- Removal of their role in assessment administration/support
- Exclusion of employer representatives from assessment activities
- Increased monitoring or evidence checks
- Termination of EPA service contract

These sanctions ensure EPA integrity and prevent delays or risks to assessment validity



Appendix Three EQA Monitoring/Centre Visits/Actions

All Centres will be visited by PAL at a frequency and mode determined by their Centre risk status as defined by the awarding organisation (PAL) and advised to the Centre. EQA activities may be face-to-face or virtual, and the format and frequency will be decided by the PAL Quality Manager based on a risk assessment of the Centre.

Centres which fail to confirm reasonable requests for Centre visits, meetings, activities or which cancel a pre-arranged EQA: Centre visit/activity at short notice and/or without suitable explanation and alternative date/time provided to PAL's Quality Manager may have a sanction applied.

Reasons that may be considered by PAL as 'exceptional circumstances' for which a Centre visit can be rearranged without penalty or sanction include (but are not limited to) the following:

- Illness of the Head of Centre or the equivalent role (where their involvement in the EQA activity is essential), or requirement to attend a medical appointment, or accident or emergency involving the Head of Centre.
- Medical or other emergency of a spouse or dependent of the Head of Centre.
- Business-critical appointments which cannot be moved or changed for example, bid/tender meetings, OFSTED Inspection.

Please inform PAL immediately when you are aware of any situation which may prevent a Centre External Quality Assurance visit/activity. In every case, the Head of Centre must establish that there is no suitable alternative deputy who can attend the visit and must ensure that the PAL Quality Manager has been informed of their absence. This must be done verbally or by email in which case confirmation of receipt should be sought. New visit/activity dates must be agreed upon within two weeks of cancellation. The PAL Quality Manager will advise the assigned EQA accordingly both via email and verbally.

Cancellation of two consecutive pre-arranged and confirmed Centre visits, no matter what the circumstances, may lead to a sanction being applied.

In all cases, Centres should seek advice from the PAL Quality Manager. Reasonable requests to rearrange Centre visits with appropriate notice will always be considered.

Appendix Four Sanctions imposed on individuals-

Sanctions imposed on third party staff

Third party personnel have no active involvement in assessment; however, they are involved in supporting gateway submissions, making requests for reasonable adjustments and have access to evidence items such as portfolios and projects, that can be presented as evidence, or underpin assessment activities. Persistent failure to comply with gateway requirements or evidence submission which can and will affect an apprentice's ability to progress, is likely to incur some form of sanction.

Third parties may also be commissioned to support assessment instrument design, development, or pre-assessment testing.

Concerns regarding activities of a third party may be limited to specific members of staff where PAL has no confidence in the competence of an individual to discharge their duties at an Employer or Provider or supplier organisation. If the imposition of such a sanction means for example an assessment plan notes the presence, not the involvement of an employer representative is required at a professional discussion and PAL has reasonable cause to believe the third party representative's involvement will disrupt the assessment process, or disadvantage the apprentice, or adversely affect the independent assessor's ability to determine the apprentice's competence, PAL will make alternative arrangements excluding the employer representative, to allow the assessment to go ahead confirming any arrangements with the respective apprentice and relevant personnel of the appropriate regulators.

Where PAL directly identifies poor practice or behaviour during an element of end-point assessment by an employer staff member, PAL reserves the right to invoke a sanction, where the employer representative is involved in assessment activities or assessment administration.

Furthermore, if PAL has placed a sanction on an individual to prevent them from discharging a specific role or activity, any attempt to circumvent this sanction will be treated as malpractice and a threat to the integrity of the standards/ qualifications. This will lead to an escalation in sanctions.

	Sanction	What does this mean
1	Written warning against individual staff member	Identified person is notified via their organisation, that if there are further occurrences of inappropriate practice a higher sanction will be applied.
2	Special conditions	Special conditions imposed on future involvement in examinations and/or assessments by the member of staff.
3	Training	Member of staff required, as a condition of future involvement in examinations/assessments, to undertake specific training or mentoring, within a stated period, with a review at the end of the training.
4	Suspension or Ban	Member of centre staff barred from all involvement in the delivery of its examinations/assessments, either for a set period or permanently. External agencies will be informed. Member of centre staff and/or third-party staff barred from any involvement in applying for reasonable adjustments; submitting gateway submissions; involvement in evidence compilation that contributes to end-point assessment activities, either for a set period or permanently.

	Sanction	What does this mean
		External agencies will be informed.
5	Permanent Ban	Member of staff barred from any involvement in any activity pertaining to end-point assessment. External agencies will be informed.

PAL has no jurisdiction to impose sanctions on Centre or Third-party personnel where such behaviour is confined to programme delivery in the context of apprenticeship delivery.

Sanctions imposed on Centre Personnel

“Centre Staff” refers to any individual working for or on behalf of the Centre, either as an employee or in any capacity such as (but not limited to) a contractor, consultant, associate trainer, associate assessor, associate invigilator, or associate internal quality assurer.

Sanctions may be limited to specific members of staff where PAL has no confidence in the competence of an individual to discharge their duties at a Centre.

Please note that sanctions imposed upon staff do not replace the requirement on all Centres to ensure that they have a workforce of sufficient competence to deliver, assess and internally quality assure their provision.

Furthermore, if PAL has placed a sanction on an individual to prevent them from discharging a specific role or activity, any attempt to circumvent this sanction will be treated as malpractice and a threat to the integrity of qualifications/apprenticeship standards. This will lead to an escalation in sanctions.

Sanctions will be communicated to the individual concerned within three working days of the decision being made.

Any sanction imposed on any individual will apply to all PAL Centres in which the individual is working. PAL will share information about the sanction imposed on the individual with all PAL Centres for which the individual is listed or approved to work.

	Rationale	Sanction
1	Written warning	Member of staff issued a written warning that if the offence is repeated, further specified sanctions will be applied.
2	Special conditions	Special conditions imposed on future involvement in examinations/tests/invigilation and/or assessments by the member of staff.
3	Training	Member of staff required, as a condition of future involvement in examinations/assessments, to undertake specific training or mentoring, within a stated period of time, with a review at the end of the training.
4	Suspension or Ban	Member of staff barred from all involvement in the delivery of examinations/assessments, for a set period of time or permanently banned from specific activities, e.g. undertaking practical assessments. Other Awarding Organisations/Access Validating

	Rationale	Sanction
		Agencies will be informed when a suspension/permanent ban is imposed.
5	Permanent Ban	Member of staff barred from any involvement in any activity pertaining to end-point assessment. External agencies will be informed.

Sanctions applied against Apprentices/ Learners

Any sanction imposed on any Apprentice/Learner will apply to that apprentice only

Apprentice malpractice during on-programme activities or undertaking functional skills English and Maths or other qualifications, approved by other agencies are dealt with by the Providers policy and procedures. Where malpractice or maladministration is suspected or identified during the apprenticeship assessment conducted by PAL, PAL retains the right to impose a sanction on an apprentice/learner directly.

Where apprentice/learner malpractice is suspected during PAL conducted assessments, following investigation and/or a hearing, PAL reserves the right to request from the relevant certification agency that any Apprenticeship certificate claimed is invalidated and revoked.

Sanctions will be communicated to the apprentice/Learner concerned, and to the respective provider and employer at which the apprentice/ Learner is registered, in line with PAL's maladministration and malpractice policy.

Apprentices (EPA)

	Sanction	What does this mean
1	Written Feedback	Apprentice issued with feedback that if the offence is repeated further specified sanctions will apply. Provider and employer advised
2	Written Warning	Additional evidence and re-assessment of specific aspects of the assessment, required. Apprentice advised if the offence is repeated further specified sanctions will apply. Provider and employer advised. Note PAL reserves the right to deliver a fail and discontinue assessment for acts of proven malpractice so sanctions 1-3 are orientated to conduct that could be regarded as inappropriate but does not or has not impacted on any claims of competence or the meeting of the requisite knowledge, skills and behaviours.
3	End-point Assessment halted	Non-achievement recorded- relevant stakeholders notified. Recommended apprentice returns to a period of training and learning. Apprentice will need to undertake full re-assessment, which will be at the cost of the Provider/Employer
4	End-point assessment halted	Non-achievement recorded; relevant stakeholders /regulatory bodies notified immediately. PAL will not reassess a fail will be issued

	Sanction	What does this mean
5	Apprenticeship/ Qualification achievement invalidated	Request to relevant government agency/department to have the certificate revoked, cancelled/withdrawn. Relevant stakeholders/regulatory bodies will be notified immediately.

Sanctions Imposed on Learners/Apprentices reformed apprenticeships

Although Learner/Apprentice⁴ malpractice is typically dealt with by Centres within the assessment and internal quality assurance procedures, it is possible that PAL may have due cause to impose a sanction on a Learner/Apprentice directly. Where Learner/Apprentice malpractice has occurred, following an investigation and/or a hearing, PAL reserves the right to invalidate and revoke the Learner's/Apprentice's issued Unit, Qualification, Certificate, Diploma or Apprenticeship.

Sanctions will be communicated to the Learner/Apprentice concerned, and to any PAL Approved Centre at which the Learner is registered, within three working days of the decision being made.

	Sanction	What Does This Mean?
1	Written warning	Learner/Apprentice issued with a warning that if the offence is repeated, further specified sanctions will be applied.
2	Disqualification for a unit	Learner/Apprentice disqualified from the unit. Any qualifications/apprenticeships and/or units previously achieved in full are retained.
3	Disqualification from a whole qualification/apprenticeship	Learner/Apprentice disqualified from the whole qualification/apprenticeship taken in that series or academic year. Any qualifications/apprenticeships and/or units previously achieved in full are retained.
4	Learner barred – pre-certification	Learner/Apprentice barred from being entered for one or more examinations and barred from completing current qualification/apprenticeship standard. Any qualifications/apprenticeships and/or units previously achieved in full are retained.
5	Unit or Qualification or Apprenticeship achievement invalidated	The Learner's/Apprentice's issued certificate is revoked, cancelled, and withdrawn. Relevant stakeholders will be notified immediately.

PAL in the instances of proven Learner/Apprentice sanctions imposition expects the Centre to inform relevant stakeholders such as the employer where an employer is providing training and employing for the named Learner/Apprentice, PAL will confirm their decisions with relevant stakeholders as noted in our records.

⁴ For reformed apprenticeships centres may undertake some assessment so addressing sanctions may become more challenging

Appendix Five Sanctions placed on Centres/Third Parties

Third Party Provider/College Sanctions

PAL may apply these sanctions either individually or in combination. PAL will determine the appropriateness of the sanctions to be applied, depending upon the evidence presented.

Level	Rationale	Sanction	What does this mean
1	<p>Minor and infrequent errors with data processing and gateway submissions.</p> <p>Minor non-compliance or areas for further development to ensure full adherence to contracts but no threat to the programme delivery and Apprentices progressing to gateway.</p>	<p>Verbal warning and agreed actions</p>	<p>One or more of the following:</p> <ul style="list-style-type: none"> Action point(s) will be identified in a discussion/email/ letter to the third party. Third party contact to review the procedures and report back to PAL on improvement/actions to be implemented by a set date
2	<p>Frequent errors with data processing and gateway submissions, leading to the possibility or actual delay of assessments, or using inaccurate data requests for certification.</p> <p>Not responding to actions or requests for additional data registration information, in the timescales agreed.</p> <p>Some non-compliance with the Service Level Contracts, and guidance provided by PAL which may delay gateway submissions and the Apprentices' opportunities to progress, but no obvious threat to programme delivery and Apprentices progressing to gateway</p>	<p>Organisation placed at risk</p> <p>Greater scrutiny of Provider administrative practices subject for a review</p> <p>Written warning and action plan</p>	<p>One or more of the following:</p> <ul style="list-style-type: none"> Action plan agreed between PAL and the third party, to be implemented within timescales. In general, the timescales will be between ten working days and three months. Action plan should include how the third party (and this should include all interested parties) will address the Service Level Contracts and/or guidance made available via manuals, EPAPro and Padlets non-compliance Third party (this may include both Employer and Provider or one or the other) to review procedures for data processing and gateway submissions Temporary suspension of gateway submissions
3	<p>Loss of integrity of examination practices.</p> <p>Persistent errors with data processing and gateway submissions</p>	<p>Organisation placed at risk</p> <p>Suspension of further referrals</p> <p>Increased monitoring by PAL</p>	<p>One or more of the following:</p> <ul style="list-style-type: none"> Test invigilation undertaken by centre ceased <p>Third party increased scrutiny of all assessment evidence generated as projects and portfolios until PAL satisfied</p>

Level	Rationale	Sanction	What does this mean
	<p>Risk of invalid claims, or possibility of invalid claims, for certification.</p> <p>Several areas of non-compliance with the Service Level Contracts and PAL guidance and in the case of centres (approval and invigilation agreements)</p> <p>Non-compliance with the specific Apprenticeship assessment plan, with suggested impact on overall Apprentices results compared to other Apprentices on the same standard</p> <p>Failure to comply with financial terms and conditions</p> <p>/ Financial risk.</p>	<p>Event notification</p>	<p>agreed actions and revised procedures have made the required improvement</p> <ul style="list-style-type: none"> • PAL may increase at the third-party expense, additional assessment/account management activities • Action plan agreed between PAL and Centre/Third party, to be implemented, with timescales. Timescales may vary subject to the type of non-compliance under investigation. • Temporary suspension of registration and/or EPA activities • Third party required to review procedures and advise PAL's Business Operations Director of improvement plan • Immediate payment terms.
4	<p>Breakdown in management of specific assessment activities approved to support with <u>specific standards</u>, or at specific sites)- (examination invigilation) to include failure to support apprentice and provide adequate and suitable testing environment as promised</p> <p>Abuse of reasonable adjustments or special considerations, in attempt to alter an assessment outcome and give unfair advantage to an apprentice (learner or learners).</p> <p>Non-compliance with many areas of the Service Level Contract and provided guidance and information</p>	<p>Withdrawal of approval for specific assessment involvement or specific standards or specific sites/areas</p> <p>Notification to regulatory bodies and other AOs/EPAOs- in line with PAL's policies and reporting incidents</p> <p>Organisation placed at risk and entered onto PAL risk register as individual entity and specific risk and scrutiny of all sites/Apprentices working on all standards.</p>	<p>One or more of the following:</p> <ul style="list-style-type: none"> • Withdrawal of approval for specific assessment involvement or specific standards or specific sites/areas temporarily or permanently. <i>PAL will ensure all Apprentices in EPA, wherever possible can continue their assessments and other Apprentices working on specific standards are appropriately safeguarded</i> • Potential delay in the issue of results • If this requires additional resource from PAL to facilitate assessments, which incurs additional costs, outside of standard fees, provider, or employer dependent on where the non-compliance lies will need to incur extra charge

Level	Rationale	Sanction	What does this mean
		PAL IQA sampling to increase to 100%	
5	<p>Breakdown in management of all assessment activities approved to support with all standards, or at all sites (examination invigilation)- to include failure to support apprentice and provide adequate and suitable testing environment as promised, or clear evidence of cheating and/ or malpractice</p> <p>Abuse of reasonable adjustments or special considerations, in attempt to alter an assessment outcome and give unfair advantage to a learner or learners. Deliberate falsification of gateway evidence or presenting portfolio/project evidence that is not the direct work of the apprentice (learner)</p> <p>Non-compliance with many areas of the Service Level Contract and provided guidance</p>	<p>PAL plans withdrawal as EPAO</p> <p>Notification to regulatory bodies and other AOs/EPAOs- in line with PAL’s policies and reporting incidents</p>	<p>All the following likely to apply</p> <ul style="list-style-type: none"> • PAL will terminate contract as per our service level agreement- advising all concerned parties • PAL will discuss with relevant regulator and government agencies how best to support the Apprentices (learners) registered with PAL- reaching or in gateway or in assessment • Potential delay in the issue of results • If PAL incurs extra costs as a result of alternative arrangements and additional support of Apprentices, fees will be charged in addition to the standard assessment fee

Failure of a Centre or Third Party (Employer and or Provider) to Meet Payment Terms

Please refer to our invoicing policy and service level contract. PAL does reserve the right to suspend services and ultimately to cease working with any Provider or Employer who fails to meet its payment terms or is regarded as a financial risk. In all such cases PAL will endeavour to ensure the security of the apprentice’s achievement is protected and we will discuss, explore, and utilise all available options to undertake end-point assessment activities for those Apprentices affected.

Centre Sanctions

PAL may apply these sanctions either individually or in combination. PAL will determine the appropriateness of the sanctions to be applied, depending upon the evidence presented.

Level	Rationale* ⁵	Sanction	What does this mean? * ⁶
1	<p>Some non-compliance with Centre recognition/approval criteria but no threat to the integrity of assessment decisions/examination practices.</p>	<p>Written Warning.</p> <p>Action Plan.</p>	<p>One or more of the following:</p> <ul style="list-style-type: none"> ➤ Sanctions will be communicated in writing by PAL within three working days of the decisions being made to the Head of Centre. ➤ Action point(s) will be identified in the letter to the Centre. ➤ Action point(s) to be identified in PAL's reporting system and will be followed up in subsequent EQA activity to ensure the action plan as presented by the Centre has been fully implemented. ➤ May include a condition or temporary suspension of registrations until action point(s) are completed and evidenced to PAL. ➤ Head of Centre required to review the Centre's procedures and to report back to PAL on improvements implemented by a set date (usually within ten working days).
2	<p>Some doubt about the integrity of assessment due to inconsistent application of procedures, loss of key personnel or changes to employer/third party arrangements on decisions/examinations practices.</p> <p>Some non-compliance with the Centre recognition/approval criteria.</p>	<p>Greater scrutiny of assessment, internal quality assurance, and/or invigilation to ensure integrity of decisions and practices.</p> <p>Additional external quality assurance visits.</p>	<p>One or more of the following:</p> <ul style="list-style-type: none"> ➤ Assessments and/or examination practices and decisions subject to increased scrutiny and sampling % by EQA is extended (this will result in additional fees). ➤ Action plan agreed between PAL and Centre, to be implemented, with timescales. Please note that such timescales can vary and is subject to the type of non-compliance under investigation. In general, the

⁵ PAL can apply a sanction for any action in the rationale; it is not the case that the Centre displays all areas of non-compliance at a level to receive a sanction.

⁶ PAL reserves the right to select sanctions within the level, so for example we may deem it is not necessary to apply all of the sanctions at a particular level. The decision will be predicated on the circumstances and degree of non-compliance.

Level	Rationale* ⁵	Sanction	What does this mean? * ⁶
	<p>Not responding to actions.</p> <p>Late payments 30+ days on more than one occasion/Financial risk.</p> <p>Failure to advise PAL of change of ownership, changes in senior management/financial and governance risk.</p>	<p>Increased risk rating.</p>	<p>timescales will be between ten working days and three months.</p> <ul style="list-style-type: none"> ➤ Temporary suspension of certification for specific qualification(s)/ apprenticeship(s)/ unit(s). ➤ Head of Centre required to review the Centre’s procedures and to report back to PAL on improvements implemented by a set date. ➤ Restrictions on the issue/access examination/assessment materials, or the removal of activities such as Centre Invigilation - requiring PAL to make provision for testing, which will be charged to the Centre.
3	<p>Loss of integrity of assessment decisions/examination practices.</p> <p>Risk of invalid claims of competence, progression, or possibility of invalid claims, for certification.</p> <p>Non-compliance with the Centre recognition/approval criteria.</p> <p>Failure to comply with financial terms and conditions and persistent late payment (60+days)/financial risk.</p> <p>OFSTED monitoring or inspection outcomes/reports indicate issues with delivery and practices such as safeguarding provision/governance and regulatory risk- OFSTED judges across at least 3 areas of inspection that the Centre is not of acceptable standard, i.e., needs attention.</p>	<p>Temporary suspension of entry/registration and/or certification for named qualifications/ apprenticeships/ units.</p> <p>Removal of Direct Claims Status where held for certification for named qualifications or sites.</p> <p>Increased risk rating.</p>	<p>One or more of the following:</p> <ul style="list-style-type: none"> ➤ Loss of Direct Claims Status (where this applies) with certifications claims to be authorised by PAL for named qualifications or sites until further notice. ➤ Increased sampling of Centre assessment/quality assurance decisions, additional costs to be charged to the Centre. ➤ Action plan agreed between PAL and Centre, to be implemented, with timescales. Timescales may vary subject to the type of non-compliance under investigation, although it will generally be between ten working days and three months. ➤ Temporary suspension of registration for named qualifications/ apprenticeships/units - PAL reserves the right to do this for persistent non /late payment and will inform DfE/DWP of concerns. ➤ Temporary suspension of some forms of examinations/assessments, e.g., prohibited to deliver paper-based testing.

Level	Rationale* ⁵	Sanction	What does this mean? * ⁶
			<ul style="list-style-type: none"> ➤ Head of Centre required to review the Centre's procedures and to report back to PAL on improvements implemented by a set date. ➤ Immediate payment terms.
4	<p>Breakdown in management and quality assurance of <u>specific</u> qualification(s)/apprenticeship(s)/unit(s), including examination practices.</p> <p>False claims regarding Centre personnel experience, capabilities, and/or qualifications.</p> <p>Failure to comply with financial terms and conditions and persistent late payment (90+days)/financial risk.</p> <p>Loss of key clients impacting on enrolments/commercial/financial risk.</p> <p>Significant changes within a sector or sectors the Centre works with impacting on referrals and registrations.</p> <p>Key Centre personnel (delivery and management/leadership) leave organisation and are not replaced.</p> <p>OFSTED monitoring or inspection outcomes/reports indicate serious issues with leadership delivery and or practices such as safeguarding provision/provision and is not regarded as a safe fit (needs</p>	<p>Withdrawal of approval for specific qualification(s)/ apprenticeship(s)/ unit(s) or provision areas.</p> <p>Increased risk rating.</p>	<ul style="list-style-type: none"> ➤ Withdrawal of Centre approval to deliver specific PAL qualification(s)/ apprenticeship(s)/unit(s) – temporarily or permanently. ➤ Requirement for all outstanding payments to be made to PAL, before any further registrations or certification requests can be actioned or reinstated. ➤ Notification to the relevant regulatory bodies and other AOs where applicable. ➤ PAL to prepare withdrawal plan to include plans to support Centre Learners/Apprentices and action where PAL determines withdrawal of approval for specific PAL qualifications/ apprenticeships is permanent.

Level	Rationale* ⁵	Sanction	What does this mean? * ⁶
	<p>attention) across 4 of the 5 grading areas.</p> <p>DfE audit and accountability framework outcomes indicate Centre is non-compliant with funding rules and register conditions/audit and compliance risk.</p> <p>Indication potential for Centre to lose funding in some areas of provisions.</p>		
5	<p>Breakdown in management and quality assurance of <u>all</u> qualification(s)/apprenticeship(s)/ unit(s).</p> <p>False claims of Centre personnel experience, capabilities and/or qualifications and inadequate staffing levels.</p> <p>Failure to comply with financial terms and conditions and persistent late payment (120+days)/financial risk.</p> <p>Loss of key clients impacting on enrolments/commercial/financial risk.</p> <p>Significant changes within a sector or sectors the Centre works with impacting on referrals and registrations.</p>	<p>Withdrawal of approval for all qualification(s)/ apprenticeships/, unit(s) and provision areas.</p> <p>Withdrawal of Centre Recognition.</p>	<ul style="list-style-type: none"> ➤ Withdrawal of Centre approval to deliver all PAL qualification(s)/ apprenticeships /unit(s) – temporarily or permanently. ➤ Immediate payment of all outstanding invoices. ➤ Notification to the relevant regulatory bodies and other AOs where applicable. ➤ Withdrawal plan initiated and PAL to work with relevant agencies to secure as far as practically possible Learner/Apprentice progression and recognition of achievement.

Level	Rationale* ⁵	Sanction	What does this mean? * ⁶
	<p>Key Centre personnel (delivery and management/leadership) leave organisation and are not replaced.</p> <p>OFSTED monitoring or inspection outcomes/reports indicate serious issues with leadership delivery and or practices such as safeguarding provision/provision and urgent improvement is required.</p> <p>DfE audit and accountability framework outcomes indicate Centre are non-compliant with funding rules and register conditions/audit and compliance risk.</p> <p>Indication potential for Centre /business to lose key sources of funding (commercial and or publicly funded work).</p>		

Failure of a Centre to Meet Payment Terms

PAL reserves the right to suspend services and ultimately to cease working with any Centre which fails to meet its payment terms or is deemed a financial risk. In all such cases PAL will endeavour to ensure the security of Learner/Apprentice achievement and will discuss options such as payment plan options available to the Centre.

Appendix Six PAL Sanctions Policy Summary

Centre-Facing Summary (Awarding Organisation Version)

(For Centre Handbook / Qualification Apprenticeship Assessment Delivery Partners)

PAL Sanctions Policy – Summary for Centres

As an approved PAL Centre, you are required to comply with all parts of the Centre Agreement, Centre Approval criteria, and relevant regulatory guidance. PAL may apply sanctions where there is any level of non-compliance, risk or behaviour that could compromise qualification integrity or put PAL in breach of its Ofqual obligations (Conditions C2, A6, A7, A8, G1–G9, H1–H6, I4).

Why sanctions are applied:

- To protect the integrity of PAL qualifications
- To ensure learners are assessed fairly
- To safeguard PAL's ability to comply with Ofqual regulations
- To address and mitigate identified risks

What Centres must do:

- Follow PAL's assessment and quality assurance requirements
- Maintain robust internal quality assurance
- Support EQA monitoring activities
- Address actions promptly and fully
- Report any issues, risks or suspected malpractice immediately

Types of Centre sanctions include:

- **Level 1:** Written warning, action plan
- **Level 2:** Increased monitoring, additional EQA visits, temporary suspension of registrations/certification
- **Level 3:** Removal of DCS (where granted), 100% sampling, suspension of assessment activity
- **Level 4:** Withdrawal of approval for specific qualifications/sites
- **Level 5:** Full withdrawal of Centre approval

Key expectations:

- Investigations may take 10 working days to 3 months depending on complexity
- Centres bear the cost of additional monitoring linked to sanctioning
- Centres must not disadvantage learners and must support transitional arrangements
- Non-compliance may be shared with regulators and other AOs where required

This summary does not replace the full policy.

Provider/Employer-Facing Summary (EPA Sanctions)

(For Provider Handbook, Employer Briefings)

EPA Sanctions Summary for Providers and Employers

As a Provider, Employer or other Third Party supporting apprentices, you must meet the requirements of PAL's EPA Service Level Contract, EPA manuals and IfATE assessment plans. PAL may apply sanctions to protect EPA integrity and ensure compliance with regulatory conditions (C1, A6, A7, A8, B7, H5, H6).

Why sanctions are applied:

- To protect the independence and reliability of EPA
- To prevent risks to assessment validity (e.g., insecure evidence, incorrect gateway submissions)
- To ensure apprentices receive a fair, accurate assessment
- To uphold PAL's compliance with Ofqual and funding bodies

What Providers/Employers must do:

- Submit accurate and complete gateway evidence
- Provide suitable assessment premises, staff and materials
- Follow all PAL instructions for assessment administration
- Co-operate fully with investigations and evidence requests
- Avoid any behaviours that could be perceived as influencing assessment outcomes

Types of Third-Party sanctions include:

- **Level 1:** Written warning and improvement plan
- **Level 2:** Increased monitoring, temporary suspension of gateway submissions
- **Level 3:** Suspension of assessment support activities (e.g., invigilation)
- **Level 4:** Removal of approval for specific standards, mandatory PAL-only administration of assessments
- **Level 5:** Termination of contract, regulatory reporting

For individual Third-Party staff:

Sanctions may include written warnings, conditions on future involvement, mandatory training, suspension or permanent exclusion from EPA activity.

Key expectations:

- Providers/Employers must protect the apprentice's assessment experience
- Maladministration or malpractice at gateway or assessment may result in resits being charged
- PAL may exclude employer representatives where behaviour risks assessment independence
- All sanctions remain in place until PAL confirms compliance and mitigates risks

This summary does not replace the full policy.

