Malpractice and Maladministration (Training) Policy

September 2026

Quality Leisure Management Ltd, The Old Church, 31 Rochester Road, Aylesford, Kent ME20 7PR

tel: 01622 717700 www.qlmconsulting.co.uk

Quality Leisure Management Ltd is a wholly owned subsidiary of PHSC Plc

Purpose and scope

This policy sets out how Quality Leisure Management Ltd (QLM) prevents, identifies, reports, investigates and responds to suspected or actual malpractice and maladministration connected with courses delivered by or on behalf of QLM. Its purpose is to protect learners, the integrity of assessment and certification, QLM's training provision, and the requirements and reputation of relevant awarding, licensing and endorsing organisations.

The policy applies to learners, prospective learners, tutors, assessors, invigilators, markers, internal reviewers, course administrators, employees, associate consultants, subcontractors and other persons involved in the design, administration, delivery, assessment, quality assurance or certification of QLM training. It applies to classroom, practical, workplace, blended and online provision.

Definitions and related procedures

Malpractice is deliberate or improper activity, neglect, default or other practice that compromises, or could compromise, an assessment process, the integrity of a course or qualification, the validity of a result or certificate, or the credibility of QLM or a relevant external organisation.

Maladministration is non-compliance caused by error, neglect, mismanagement, incompetence, poor administration or failure to follow an approved procedure. Maladministration may be unintentional but can still affect learners, assessment integrity, records or certification.

A complaint about service quality or conduct that does not allege malpractice or maladministration will normally be handled under QLM's Malpractice and Maladministration (Training) Policy. An appeal against an assessment decision will be handled under the Examination and Appeals Policy. Safeguarding concerns will be handled under the Safeguarding Policy and will not be delayed while this procedure is followed.

Principles

QLM will seek to prevent malpractice and maladministration, encourage prompt reporting, preserve relevant evidence, manage conflicts of interest, protect affected learners and cooperate with relevant awarding, licensing or endorsing organisations. Allegations will be considered fairly, proportionately and without presuming that malpractice or maladministration has occurred.

QLM may take immediate precautionary action where necessary to protect learners, secure assessment materials or evidence, prevent further risk, or preserve the validity of assessment and certification. Precautionary action is not a finding of wrongdoing.

Preventive controls

QLM will maintain proportionate controls that include:

- using current course, assessment and administrative materials;
- authorising and briefing tutors, assessors, invigilators and administrators;
- secure storage, access, transmission and disposal of assessment materials and learner evidence;
- identity, attendance and assessment checks appropriate to the course;
- clear learner instructions on permitted conduct, resources and collaboration;
- marking, internal review and standardisation arrangements appropriate to the assessment;
- accurate learner registration, result and certification records;

- conflict-of-interest declarations and management;
- reasonable-adjustment and special-consideration controls; and
- prompt reporting of suspected irregularities to QLM and, where required, the relevant external organisation.

Examples of learner malpractice

Examples include, but are not limited to:

- impersonating another learner or arranging for another person to complete an assessment;
- cheating, copying, collusion or unauthorised collaboration;
- plagiarism or presenting another person's work, source material or generated content as the learner's own without required acknowledgement;
- possessing, accessing, sharing or using confidential assessment material without authority;
- using notes, devices, software, artificial intelligence tools or other assistance where prohibited or outside the permitted conditions;
- communicating with another person during an assessment contrary to the instructions;
- fabricating evidence, references, workplace records or assessment information;
- tampering with results, certificates or assessment documents;
- failing to follow invigilator or assessment instructions; and
- disruptive, threatening or abusive conduct that compromises an assessment.

Examples of staff, tutor or contractor malpractice

Examples include, but are not limited to:

- disclosing, discussing or failing to secure confidential assessment materials;
- altering marks, evidence, attendance or results without proper authority or supporting evidence;
- providing improper assistance or coaching during an assessment;
- allowing prohibited materials, communication, collaboration or additional time without authorisation;
- falsifying learner, assessment, quality-assurance or certification records;
- submitting fictitious learners or claims;
- failing to report suspected malpractice or concealing relevant evidence;
- marking, internally reviewing or invigilating where an unmanaged conflict of interest exists;
- leaving an assessment unsupervised where supervision is required; and
- obstructing or failing to cooperate with an authorised investigation.

Examples of maladministration

Examples include, but are not limited to:

- using obsolete assessment papers, marking guidance, forms or course documentation;
- inadequate invigilator, tutor, assessor or administrator briefing;
- incorrect learner registration, attendance, result or certification data;
- failure to provide or record an approved reasonable adjustment;
- weak security, storage, transfer or disposal of assessment materials;
- failure to follow submission, marking, standardisation, internal-review or result-reporting requirements;

- late or incomplete information supplied to an external organisation;
- failure to investigate or report an incident within required arrangements; and
- failure to retain records or evidence for the applicable period.

Reporting a concern

Any person who becomes aware of suspected malpractice or maladministration should report it promptly to the Managing Director at admin@qlmconsulting.co.uk. A report should include the course, learner or assessment concerned, the nature and date of the suspected incident, persons involved, available evidence and any immediate risk to learners, assessment materials, results or certification.

A concern may be raised anonymously. QLM will consider an anonymous report where sufficient information is available, although anonymity may limit the ability to verify evidence, seek clarification or provide an individual response. QLM will take reasonable steps to protect a reporter's identity, but confidentiality cannot be guaranteed where disclosure is required by law, necessary for a fair investigation, or required by an awarding, licensing or endorsing organisation.

Initial response and notification

Stage 1 – Triage and preservation. QLM will record the allegation, secure relevant materials and records, assess immediate risks, identify conflicts of interest and determine whether precautionary action is required.

Stage 2 – Scope and notification. QLM will decide whether the matter can be resolved as an administrative correction, requires an internal investigation, or must be notified or referred to an awarding, licensing or endorsing organisation. QLM will follow the current reporting and cooperation requirements of the relevant organisation.

Affected learners and persons subject to an allegation will be informed where appropriate, taking account of evidence preservation, confidentiality, safeguarding, legal duties and instructions from an external organisation.

Investigation

The Managing Director will appoint an investigator who has suitable competence, was not directly involved in the matter and has no material conflict of interest. The investigation will be proportionate to the seriousness, scale and potential effect of the allegation.

The investigation may:

- establish the facts, chronology and persons involved;
- secure and review assessment materials, learner work, records, communications and audit information;
- identify affected learners, courses, assessment decisions, results or certificates;
- interview relevant persons and obtain written statements;
- consider whether QLM or external requirements were followed;
- identify root causes, control weaknesses, patterns or wider implications; and
- determine immediate, remedial, corrective and preventive action.

A person subject to an allegation will normally be told the substance of the allegation and the supporting evidence, given a reasonable opportunity to respond and permitted to provide relevant evidence. A person invited to an investigation meeting may be accompanied by a support person, provided that the support person does not answer questions on the person's behalf or compromise the investigation.

Investigation outcome and report

The investigation will conclude whether the allegation is substantiated, partially substantiated, unsubstantiated or cannot be determined on the available evidence. The decision will use the standard of proof required by the relevant external organisation or, where none is specified, the balance of probabilities.

QLM will produce an appropriate written record covering the allegation, evidence, findings, affected learners or assessments, external notifications, decision, reasons, action and responsibility for completion. Information provided to individuals may be limited where necessary to protect personal information, confidential assessment materials or the rights of others.

Actions and sanctions

Any action will be proportionate to the seriousness, intent, impact, previous history and applicable external requirements. QLM may take one or more of the following actions:

- provide advice, instruction, retraining, supervision or formal standardisation;
- correct administrative records or repeat an administrative process;
- remark, internally review, repeat or void an assessment where authorised;
- withhold, amend or withdraw a result or certification recommendation where permitted;
- require additional evidence or quality-assurance activity;
- remove a person from assessment, invigilation, marking or delivery duties;
- suspend or end a learner's participation or a contractor's involvement, subject to applicable terms and procedures;
- notify affected learners, clients or external organisations where required;
- refer a matter for disciplinary, contractual, safeguarding, regulatory or legal action; and
- review other learners, courses, results or certificates where the findings indicate a wider risk.

Where an awarding, licensing or endorsing organisation controls the final decision or sanction, QLM will provide the required evidence and implement the organisation's decision within QLM's responsibilities.

Appeals

A learner or other person directly affected by a QLM decision under this policy may request a review where the decision letter provides that right. The request should identify a material procedural error, relevant evidence not reasonably considered, a conflict of interest, or a decision that is not supported by the findings. Any external appeal will follow the current procedure of the relevant awarding, licensing or endorsing organisation.

Confidentiality, data protection and records

QLM will handle reports, evidence and investigation records sensitively. Information will be shared only with those who need it to assess risk, investigate, decide, implement action, meet a legal obligation or comply with an applicable external requirement. Records will be stored securely, access will be restricted to authorised persons and retention will follow QLM and relevant external requirements.

Corrective and preventive action

Where an investigation identifies a failure or risk, QLM will record and implement proportionate corrective or preventive action. The record will identify the issue, root cause, affected learners or assessments, immediate containment, required action, responsible person, target date and verification of effectiveness.

QLM will consider whether the findings affect other learners, courses, assessments, results or certificates and will take authorised action to correct or mitigate any wider effect.

Monitoring and organisational learning

QLM will review reports, findings, assessment irregularities, sanctions, corrective actions and external quality-assurance information to identify recurring issues, emerging risks and opportunities to strengthen training and assessment controls. Significant themes and actions will be considered through QLM's management review arrangements.

Responsibilities

The Managing Director has overall responsibility for this policy, external notification and oversight of investigations. Directors are responsible for allocating investigations, managing conflicts, protecting affected learners and ensuring actions are completed. Tutors, assessors, invigilators, administrators, employees, associates and subcontractors must prevent, identify and report concerns, preserve evidence, cooperate with investigations and implement agreed controls. Learners must follow assessment instructions, submit authentic work and provide accurate information.

Policy review

This policy will be reviewed biannually and sooner where required by changes to QLM's courses, awarding or endorsing organisation requirements, legislation, identified risks, investigation findings or quality-assurance activity.

Signed: Date: September 2026

Leigh Simmonds
Quality Leisure Management Ltd