



assessments

Policy

Sanctions

Apprenticeship End-point Assessment – Sanctions Policy

EPA Sanctions Policy	
Applies to:	Centre's, Employers, Training Providers, Apprentices, In2Assessments staff and Associated Third Parties
Effect from and replaces all previous versions prior to	9 November 2021
Owned By	In2assessments
Reviewed and Monitored by	Head of In2assessments
Document Location	Website & EPA resource area
Review Frequency	Annually

Introduction

This policy applies to the Apprenticeship End Point Assessments (EPA) provided by In2Assessments.

1. Policy Statement

This policy document details the sanctions In2Assessments may be imposed if any End Point Assessment (EPA) requirements, as detailed in the assessment plan, Education and Skills Funding Agency (ESFA) funding rules and Institute for Apprenticeships (IfA) guidance, Office of Qualifications and Examinations Regulation (Ofqual) guidance and In2Assessments EPA documentation, have not been met (non-compliance).

In2Assessments has a responsibility to ensure EPA is conducted in a manner, which is consistent and comparable irrespective of the employer, geographic spread and range of technical experts participating in EPA.

In2Assessments will review the policy annually as part of our self-evaluation and commitment to quality and continuous improvement to revise it as and when necessary in response to changes in policy, external quality assurance or as a result of our internal monitoring arrangements.

This policy is for Centres, employers, training providers, and employer technical experts involved in the scheduling and delivery and audit of EPA activities.

Sanctions are imposed on the Centre as they are the employer of the apprentices and the organisation that has selected In2Assessments as their EPA service provider. The awarding organisation is responsible for the EPA process and only the awarding organisation can issue an award. If a Centre chooses to contract services to organisations, other than the awarding organisation, they can only do this in line within Ofqual and ESFA rules on subcontracting and with the recognition that responsibility remains with the employer.

Where In2Assessments Assessors deliver the EPA, internal In2Assessments disciplinary procedures will apply.

2. Responsibilities

It is important that those participating in the delivery of EPA are fully aware of the contents of the policy and its possible implications should there be a failure to comply with requirements specified by In2Assessments in relation to the delivery of EPA and to meet the requirements of the ESFA, IfA, Ofqual and the published assessment plans.

3. Approach to Sanctions

In2Assessments has a range of sanctions that can be imposed. If required these will be imposed depending on the seriousness of the situation, the level and track-record of non-compliance and the risk to the interests of apprentices and the integrity of assessment and / or any effects on the public confidence in In2Assessments service delivery.

In2Assessments aims to ensure that the application of sanctions is made only when absolutely necessary to protect the integrity of EPA. Through our approach to support and management, and the creation of appropriate action plans (such as an action plan in response to a minor infringement identified at audit), we will work with employers, training providers, and assessors to prevent situations arising that would warrant a sanction being imposed.

If sanctions are required then they will be applied depending on the nature of the situation.

Examples of when a sanction may be imposed are as follows:

- Actions identified as a result of audit have not been adopted
- Poor conduct or records of EPA decisions
- No employer process to ensure eligibility to enter EPA
- Proven collusion
- Suspected or proven cases of maladministration / malpractice which are being investigated
- Falsification of apprenticeship data
- Refused access to premises and / or records to the staff of In2Assessments
- Cancellation of planned audit without a legitimate reason

4. Sanctions that may be imposed

Sanctions will be applied in an escalating level of effect. It is the responsibility of the In2Assessments Head to ensure that there is clear evidence of non-compliance and / or a sufficient rationale before determining the sanction. The imposition of any sanction by In2Assessments will be reviewed and endorsed by the Head of In2Assessments. In2Assessments will never impose sanctions without providing the employer an opportunity to address the area of non-compliance. Should sanctions be unavoidable, In2Assessments will take all reasonable steps to protect the interests of any apprentices currently registered on the Standard(s).

Level 1 sanctions

Depends on the area of non-conformance but could include:

- Additional audit of EPA activities at the next cohort
 - This will incur an additional charge by In2Assessments to the employer
- Additional sampling during EPA organisation quality assurance (only applicable to some standards)
 - This will incur an additional charge by In2Assessments to the employer

Level 2 sanctions

Relocation of EPA activities (for, example, the current facilities are inadequate for quality EPA delivery)

Delay to the delivery of EPA activities, until further evidence has been provided confirming gateway requirements have been met

Removal of approval of a technical expert to deliver EPA activities

Removal of the employer from the relevant standard

Level 3 sanctions

Prevention of further apprentice registrations for EPA

Sanctions will be reported to the IfA /Ofqual where appropriate

5. Disagreements

If the employer disagrees with the imposed sanctions they can make a complaint (in accordance with our complaint policy) or appeal (in accordance with our appeals policy).

6. Removal of Sanctions

It is the aim at In2Assessments to support Centres and, where possible, work with them to remove / reduce sanctions as soon as possible. In all cases where we impose a sanction, Centres will be provided with an action plan or action points which must be completed to the satisfaction of the Head of In2Assessments before we review the removal of sanctions.

It is important to note that the removal of sanctions may also be dependent on external forces outside of In2Assessments, e.g., the IfA, but we will inform Centres this is the case and work with employers to resolve the situation.

7. Activities to Reduce the Risk of Sanctions

In order to ensure consistency and minimise the risk of sanctions being imposed, In2Assessments will carry out the following monitoring, planning and training activities:

- Provide advice and support on the interpretation of the published standard and assessment plan

- Risk assess and train all Independent Assessors

- Identify auditors, technical experts, Final Decision Panel members and external examiners based on their area of expertise and geographical location

- Ensure no conflicts of interest (refer to conflict of interest policy)

- Guidance on the gateway to enter EPA

- Provide all grading documentation and associated guidance

- Produce EPA tools

- Monitor results of apprenticeship by EPA activity and assessor

- Conduct audits of technical experts delivering EPA activities. Audits will identify if there are any minor or major infringements in the delivery of the EPA activity.

- Sample assessment decisions to confirm that the apprentice evidence is authentic and valid and that the standards are being consistently maintained and the requirements of the assessment plan are met

- Check evidence and apprentice information / records ahead of any claim for certification