

Catch22 College Policy

Malpractice, Maladministration and Plagiarism Policy

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Catch22 reserves the right to amend this policy, following consultation, where appropriate.

Policy Owner:	Catch22 Colleges
Queries to:	Will Duke-Oddy
Date created:	7th May 2025
Date of last review:	27th October 2025
Date of next review:	31st August 2026
Catch22 group, entity, hub:	Catch22 Colleges
4Policies level (all staff or managers only)	All Catch22 College Staff

Document Version Control & Changes

Version	Last modified	By	Changes Made
1.0	7th May 2025	Will Duke-Oddy - Quality & Curriculum Manager - OSH	New Policy Created
2.0	<i>27th October 2025</i>	<i>WD-O</i>	<i>Updates to formatting</i>

1. What is the policy about?

Catch22 Colleges are committed to delivering high quality education that consistently meets the need of its learners, employees and the requirements of all its Awarding Organisation standards. Catch22 Colleges will maintain integrity by adhering to Awarding Organisations centre agreements in line with centre approvals, through internal policy & procedure on assessment, and continued quality assurance activity.

This policy should be used in conjunction with the 'Assessment & IQA Policy', other relevant Catch22 policies and relevant awarding body documentation.

The below outlines the steps our centres, learners and/or other personnel must follow when reporting suspected or actual cases of malpractice/maladministration/plagiarism and our responsibilities in dealing with such cases. It also sets out the procedural steps Catch22 Colleges must follow when reviewing the cases.

2. Who does this policy apply to?

This policy outlines processes if suspected or actual Malpractice, Maladministration and/or Plagiarism occurs within Catch22 Colleges and ensure that any procedures are deployed in a consistent manner. This includes all stakeholders including learners, who are registered on Catch22 learning programmes or courses, approved qualifications or units, staff employed on a fulltime or part-time basis, and all other stakeholders of Catch22 Colleges.

3. Policy requirements

Centre's responsibility

It is important that both; our staff involved in the management, assessment and quality assurance of our qualifications, and learners are fully aware of the contents of this policy & awarding body documentation, and we have arrangements in place to prevent and investigate instances of malpractice, maladministration and plagiarism. It is everybody's ongoing responsibility to be vigilant, and report all suspected occurrences of Malpractice, Maladministration and Plagiarism in a timely and appropriate manor as outlined hereafter.

JCQ – General Regulations for Approved Centres 2024-2025 – States; *Centres will;*

a) take all reasonable steps to prevent the occurrence of any malpractice (which includes maladministration) before, during and after assessments have taken place;

b) inform the awarding body immediately of any alleged, suspected or actual incidents of malpractice or maladministration, involving a candidate or a member of staff, by completing the appropriate documentation;

c) as required by an awarding body, gather evidence of any instances of alleged or suspected malpractice (which includes maladministration) in accordance with the JCQ document

Suspected Malpractice - Policies and Procedures, 1 September 2024 to 31 August 2025 and provide such information and advice as the awarding body may reasonably require.

Malpractice

Malpractice means any act, default or practice which is a breach of the regulations or which:

- gives rise to prejudice to learners; and/ or
- compromises public confidence in qualifications; and/ or
- compromises, attempts to compromise or may compromise the process of assessment, the integrity of any qualification or the validity of a result or certificate; and/ or
- damages the authority, reputation or credibility of any awarding body or centre or any officer, employee or agent of any awarding body or centre.

Malpractice may include a range of issues from the failure to maintain appropriate records or systems, to the deliberate falsification of records to misleadingly claim achievement certificates.

Catch22 Colleges also considers the term to cover misconduct and forms of unnecessary discrimination or bias towards individuals or groups of learners.

Examples of malpractice could include;

- Failure to carry out internal assessment, internal moderation or internal verification in accordance with awarding body requirements
- Deliberate failure to adhere to awarding body learner registration and certification procedures.
- Deliberate failure to continually adhere to awarding body centre recognition and/or qualification approval requirements or actions assigned to Catch22 Colleges.
- Deliberate failure to maintain appropriate auditable records, e.g. certification claims and/or forgery of evidence
- Fraudulent claim(s) for certificates
- Intentional withholding of information from the awarding body which is critical to maintaining the rigour of quality assurance and standards of qualifications
- Collusion or permitting collusion in exams/assessments
- Learners still working towards qualification after certification claims have been made

Maladministration

Maladministration is any activity or practice which results in non-compliance with administrative regulations & requirements and includes the application of persistent mistakes or poor administration.

Examples of maladministration

- Persistent failure to adhere to awarding body learner registration and certification procedures.

- Persistent failure to adhere to awarding body centre recognition and/or qualification requirements and/or associated actions assigned to the centre
- Late learner registrations (both infrequent and persistent)
- Unreasonable delays in responding to requests and/or communications from awarding body
- Inaccurate claim for certificates
- Failure to maintain appropriate auditable records, e.g. certification claims and/or forgery of evidence
- Withholding of information, by deliberate act or omission, from us which is required to assure active

Plagiarism

Plagiarism is the practice of learners submitting any work for assessment that is not their own. This could be any percentage of work that has not been referenced and has been copied from published work, the internet, AI or any other sources.

Examples of plagiarism include:

- The use of content including text, images, diagrams etc. without acknowledgement of the source.
- Copying extracts or whole texts from another's work, published or unpublished, without the use of quotation marks and/or acknowledgement of the source
- Paraphrasing/summarising extensively the work of another or using their ideas without an acknowledgement of the source
- The use of purchased essays submitted as a learner's own work
- The use of AI generated work

Colleges must establish & evidence measures to ensure that learners are aware of the importance of submitting their own independent work for assessment and for identifying potential malpractice.

Artificial Intelligence (AI) guidance from the Joint Council for Qualifications (JCQ)

ChatGPT and other forms of AI could be used by learners. To support centers, the JCQ has shared guidance to help avoid misuse.

While the potential for learner AI misuse is new, most of the ways to prevent or mitigate the risks of misuse are not.

The JCQ guidance reminds centers and assessors of best practice in this area, and helpfully applies it in the context of AI use. Catch22 Colleges need to:

Explain the importance of learners submitting their own independent work

Ensure that assessors are familiar with AI tools and their risks

Ensure that learners acknowledge the use of AI when used

Explain that misuse of AI tools is malpractice

Within the document, there is a list of potential indicators of AI use that may help identify work where learners have misused AI. For further information please review the JCQ AI use in Assessment Guidance document; [here](#).

Process for Allegations of Malpractice and/or Maladministration

Anybody who identifies or is made aware of suspected or actual cases of malpractice or maladministration at any time must immediately notify both their Line Manager & Senior Operations Manager or follow 'Catch22 Whistle Blowing Policy.'

In doing so they should email and enclose appropriate supporting evidence.

All allegations must include (where possible):

- Learner's name and registration number
- Catch22 staff members name and job role - if they are involved in the case
- Details of the course/qualification affected, or nature of the service affected
- Nature of the suspected or actual malpractice and associated dates & details

Staff at centres should not initiate any type of investigation before liaising with managers.

Upon receipt of suspected or actual cases, and prior to any investigation, Line Managers and/or Senior Operations Manager must report/communicate to/with awarding bodies in line with awarding body documentation, policy & procedure. Failure to report suspected malpractice and/ or to co-operate with follow up activity may lead to awards not being made, certificates not being issued, future entries and/ or registrations not being accepted or withdrawal of qualification and/or centre approval.

Senior Operations Managers, with insight and with communication from awarding bodies, will then conduct a full investigation and complete any required actions.

In all cases of suspected malpractice and maladministration reported, Catch22 will protect the identity of the 'informant' in accordance with our duty of confidentiality and/or any other legal duty.

Process for Allegation of Plagiarism

All instances of suspected or actual cases of plagiarism should be reported to the relevant Line & Senior Operations Manager, or follow *Catch22 Whistle Blowing Policy*.

In doing so they should email and enclose appropriate supporting evidence.

All allegations must include (where possible):

- Learner's name and registration number
- Catch22 staff members name and job role - if they are involved in the case
- Details of the course/qualification affected, or nature of the service affected
- Nature of the suspected or actual plagiarism details

Staff at centres should not initiate any type of investigation before liaising with managers.

Upon receipt of suspected or actual cases, and prior to any investigation, Line Managers and Senior Operations Managers must report/communicate to/with awarding bodies in line with awarding body documentation, policy & procedure. Failure to report suspected plagiarism and/ or to co-operate with follow up activity may lead to awards not being made, certificates not being issued, future entries and/ or registrations not being accepted or withdrawal of qualification and/or centre approval.

Senior Operations Managers, with insight and with communication from awarding bodies, will then conduct a full investigation and complete any required actions.

Awarding Bodies may only investigate incidents of learner plagiarism when a declaration of authenticity has been signed by the learner. This may include learner work submitted for assessment electronically via an e-portfolio or by any other electronic means as having been declared as authentic by the learner. In the instance where awarding bodies do not investigate incidents an internal investigation will be managed by Senior Operations Managers.

In all cases of suspected plagiarism reported, Catch22 will protect the identity of the 'informant' in accordance with our duty of confidentiality and/or any other legal duty.

Confidentiality and Whistle Blowing

Although it is always preferable for reporting individuals to reveal their identity for investigative purposes, if an individual making an allegation of malpractice, maladministration or plagiarism wishes to remain anonymous due to concerns around adverse consequences, individuals may request that Catch22 do not divulge their identity within any investigation reports or evidence.

While Catch22 Colleges are prepared to investigate issues which are reported to us anonymously, we shall always try to confirm an allegation by means of a separate investigation (alongside awarding body recommendations) before taking up the matter with those the allegation relates.

Responsibility for the investigation

In accordance with regulatory and awarding body requirements all suspected cases of maladministration, malpractice & plagiarism will be promptly reported to awarding organisations and examined quickly by Catch22 to establish if instances of malpractice, maladministration or plagiarism has occurred and will take all reasonable steps to prevent any adverse effect from the occurrence as defined by Ofqual.

We will acknowledge receipt, as appropriate, to external parties within 48 hours.

The **Director of Learning and Skills** will be responsible for ensuring that any investigation is carried out in a prompt and effective manner and in accordance with the procedures both in this policy and outlined in awarding body documentation. Upon advice from awarding

organisations, they may allocate a relevant member of staff to lead the investigation and establish whether or not the malpractice, maladministration or plagiarism has occurred, upon review of any supporting evidence received or gathered by Catch22.

Notifying relevant parties

Where applicable, our **Director of Learning and Skills** or **Senior Operations Managers** will inform the appropriate regulatory authorities if it is believed there has been an incident of malpractice or maladministration which could either invalidate the award of a qualification or could affect another awarding organisation.

Where the allegation may affect another awarding organisation and their provision, Catch22 will also inform them in accordance with the regulatory requirements and obligations imposed by the regulator Ofqual. If we do not know the details of organisations that might be affected, Catch22 will enlist Ofqual to help identify relevant parties that should be informed.

Investigation timelines and summary process

Catch22 Colleges aim to action and resolve all stages of any investigation within 10 working days of receipt of the allegation.

The fundamental principle of all investigations is to conduct them in a fair, reasonable and legal manner, ensuring that all relevant evidence is considered without bias. In doing so investigations will be based around the following broad objectives:

- To establish the facts relating to allegations/complaints to determine whether any irregularities have occurred.
- To identify the cause of the irregularities and those involved.
- To establish the scale of the irregularities.
- To evaluate any action already taken
- To determine whether remedial action is required to reduce the risk to current registered learners and to preserve the integrity of Catch22 and the qualification.
- To identify any adverse patterns or trends.

Investigations may involve a request for further information from relevant parties and/or interviews with personnel involved in the investigation. Therefore, we will:

- Ensure all material collected as part of an investigation is kept secure.
- If an investigation leads to invalidation of certificates, or criminal or civil prosecution, all records and original documentation relating to the case will be retained until the case and any appeals have been heard and for five years thereafter.
- Expect all parties, who are either directly or indirectly involved in the investigation, to fully co-operate with us.

Either at notification of a suspected or actual case of malpractice or maladministration and/or at any time during the investigation, we reserve the right to withhold a learner's, and/or cohort's, results.

Where a member of Catch22's staff or a Catch22 associate is under investigation we may suspend them or move them to other duties until the investigation is complete.

Throughout the investigation our **Director of Learning and Skills** will be responsible for overseeing the work of the investigation team to ensure that due process is being followed, appropriate evidence has been gathered and reviewed and for liaising with and keeping informed relevant external parties.

Investigation report

After an investigation, the **Director of Learning and Skills** will produce a draft report for the parties concerned to check the factual accuracy. Any subsequent amendments will be agreed between the parties concerned. The report will:

- Identify where the breach, if any, occurred.
- Confirm the facts of the case.
- Identify who is responsible for the breach (if any)
- Confirm an appropriate level of remedial action to be applied.

The final report must be available to all parties concerned and to the regulatory authorities and other external agencies as required.

If an independent/third party notified us of the suspected or actual case of malpractice, we'll also inform them of the outcome – normally within 10 working days of making our decision - in doing so Catch22 may withhold some details if to disclose such information that would breach a duty of confidentiality or any other legal duty.

Investigation outcomes

If the investigation confirms that malpractice or maladministration has taken place, Catch22 will consider what action to take to:

- Minimise the risk to the integrity of certification now and in the future
- Maintain public confidence in the delivery and awarding of qualifications
- Discourage others from carrying out similar instances of malpractice or maladministration
- Ensure there has been no gain from compromising our standards

The action taken may include:

- Imposing actions to address the instance of malpractice/maladministration and to prevent it from reoccurring

- In cases where certificates are deemed to be invalid, inform the Awarding Organisation concerned and the regulatory authorities why they're invalid and any action to be taken for reassessment and/or for the withdrawal of the certificates. We'll also let the affected learners know the action taken and that their original certificates are invalid and ask – where possible – to return the invalid certificates to Catch22.
- Informing relevant third parties (e.g. funding bodies) of our findings in case they need to take relevant action in relation to the centre.

In addition to the above the **Director of Learning and Skills** will record any lessons learnt from the investigation and pass these onto relevant internal colleagues to help prevent the same instance of maladministration or malpractice from reoccurring.

If the relevant party (ies) wishes to appeal against our decision to impose sanctions, please refer to 'Catch22 Complaints Procedure'.

4. Related policies

Catch22 Quality Assurance Policy

Quality Assurance of Teaching & Learning Strategy – Catch22 Colleges

Catch22 Complaints Policy

Catch22 Risk Management Policy

Catch22 Managing allegations policy

Appeals Policy & Procedures – Catch22 Colleges

Assessment and IQA Policy – Catch22 Colleges

Fraudulent and Mistaken Claims Policy – Catch22 Colleges

Internal Quality Assurance Strategy Policy – Catch22 Colleges

Registration & Certification Policy – Catch22 Colleges

5. Appendices

Annex 1: Equality Impact Assessment

Catch22 is committed to always: avoiding the potential for unlawful discrimination, harassment and victimisation; advancing equality of opportunity between people who share a protected characteristic and those who do not; and, foster good relations between people who share a protected characteristic and those who do not.

An Equality Impact Assessment (EIA) is a tool for identifying whether or not strategies, projects, services, guidance, practices or policies have an adverse or positive impact on a particular group of people or equality group. While currently only public bodies are legally required to complete EIA's, Catch22 has adopted the process in line with its commitment to continually improve our equality performance.

1. Summary

This EIA is for:	Malpractice, Maladministration and Plagiarism Policy Catch22 College
EIA completed by:	Will Duke-Oddy - Quality & Curriculum Manager - OSH
Date of assessment:	07/05/2025
Assessment approved by:	<Name>, <Position> [if required]

Objectives and intended outcomes
This EIA has been completed in order to ensure that the implications and potential impact, positive and negative, of the Malpractice, Maladministration and Plagiarism Policy Catch22 College for all staff have been fully considered and addressed, whether or not the staff members share a protected characteristic.

2. Potential Impacts, positive and negative

Equality Area	Positive	Neutral	Negative	Summary
Age	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The policy applies equally to all members of staff regardless of age. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively on any member of staff because of their age.
Disability	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The policy applies equally to all members of staff regardless of health/disability. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively on any member of staff because of their disability.
Pregnancy & Maternity/paternity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	It's not considered that the policy positive or negatively impacts on pregnant women or on staff on maternity or paternity leave.
Race (incl. origin, colour and nationality)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The policy applies equally to all members of staff regardless of their race, origin, colour or nationality. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively in these respects.
Gender and Gender Re-assignment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The policy applies equally to all members of staff regardless of their gender at any given time. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively on any member of staff because of gender.
Sexual Orientation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The policy applies equally to all members of staff regardless of their sexual orientation. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively on any member of staff because their sexual orientation.

3. Negative impacts and mitigations

Negative Impact	Mitigation	Owner