



ICM

Sanctions Policy

Institute of Commercial Management (ICM)
ICM House
Yeoman Road
Ringwood
Hampshire
BH24 3FA
England
Tel: +44 (0) 1202 490555
Email: info@icm.education
Web: www.icm.education

Statement of Intent

ICM is committed to openness and accountability. In line with this commitment we expect employees, Learners, Examiners or those contracted to provide services to ICM who have serious concerns about any aspect of our work to come forward and voice those concerns with the knowledge that, if made in good faith, their action will be viewed positively.

A handwritten signature in black ink that reads "Adair Ford". The signature is written in a cursive style with a large initial 'A'.

Adair Ford
Chairman & CEO

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1. Policy Statement

The purpose of this policy is to:

- explain the actions ICM will take when issues of non-compliance arise at ICM Approved Centres (referred to as 'Centres')
- explain how we will enforce the terms of our Centre agreement
- provide guidance about the meaning of sanctions and how a Centre can comply with them.

The aim of applying sanctions is to:

- minimise the risk to the integrity of ICM qualifications
- ensure all certificates are issued appropriately
- allow time to investigate suspected maladministration or malpractice while maintaining the integrity of the qualification involved.

It is the responsibility of ICM to alert the Centre of any incident that has occurred that could lead to sanctions being applied to it.

This policy is designed to work alongside the ICM Malpractice and Adverse Effects Policies.

2. How to Implement the Policy

2.1 Applying Sanctions

If a Centre follows the ICM policies and procedures it is unlikely that sanctions will be applied. However, ICM encourages Centres to report any problems as soon as possible. In certain cases, issues occur at Centres that lead to ICM needing to apply sanctions in order to ensure that the Centre returns to compliance, meets the terms of the Centre agreement and to ensure the integrity of ICM qualifications. ICM will use information that may lead to sanctions being applied from a range of sources. In addition to ICM staff, these will include notifications from Learners, other Awarding Organisations or from whistleblowers. ICM will follow the procedures set out in the Malpractice Policy to investigate and identify the action to be taken. ICM will inform a Centre when a higher level sanction has been applied and what must be done to rectify the situation. In most cases once the situation has been rectified the sanction will be removed. However, in some cases, if a high level sanction has been applied ICM may instead reduce the level of sanction applied.

2.2 Sanctions Table

The table below outlines the ICM sanctions with a rationale for application. A list of examples of situations that may lead to sanctions is in the appendix to this policy.

Level	Rationale	Sanction
1	Some non-compliance with Centre recognition criteria but no threat to the integrity of assessment decisions	Comment and action point in a Regional Coordinators or ICM report
2	Some doubt about the integrity of assessment arrangement	Greater scrutiny of examination arrangements

3	Exam material compromised Non-payment of invoices	Temporary suspension of registration for specific qualifications/units or areas of provision
4	Breakdown in communication, management or quality assurance of specific qualifications/units	Withdrawal of ICM Approved Centre recognition for specific qualifications/units or areas of provision
5	Breakdown in communication, management or quality assurance of all qualifications/units	Withdrawal of ICM Approved Centre recognition for all qualifications/units

NB. Lower level sanctions not acted on/actions set not adhered to/corrective measures consistently not put in place over a period of time will result in a higher level sanction being applied.

2.3 Action a Centre needs to take

When applying a sanction ICM will explain what action is required by the Centre. When imposing sanctions on a Centre the impact this may have on Learners who may be affected through no fault of their own will be considered. If the sanction applied leads to non-certification ICM will take steps to ensure that the Learners affected are appropriately supported, for example by signposting them to other Centres or making arrangements for them to retake their assessment. ICM expects the full cooperation of a Centre in any issue that affects its Learners.

3. Appealing a Decision

If a Centre disagrees with a decision made by ICM in respect of this policy then there is a right of appeal. Appeals must be submitted to the ICM Chief Executive Adair Ford who will acknowledge it within 5 working days. Full details about the appeals process is described in the Appeals and Complaints Policy.

4. Reviewing and Removing Sanctions

The sanction will remain in place until:

- The Centre has addressed the issue to ICM's satisfaction
- ICM has completed an investigation and concluded that there is no longer a threat to the integrity of its qualifications or the ability to effectively award certificates
- An appeal has been upheld

The level of sanction applied may be increased if:

- The Centre does not address the issue
- ICM uncovers further issues as a result of investigations

In some cases ICM may reduce the level of sanction applied rather than remove the sanction in order to ensure that there is no longer a threat to the integrity of ICM's qualifications or the ability to effectively award certificates.

Appendix

Examples of issues that can lead to sanctions being applied

Level 1 Sanction

Centre agreement category	Issue
Compliance	<ul style="list-style-type: none"> • Centre's use of our logo does not comply with our guidance • Requested evidence for Centre recognition (e.g. staff CVs) not supplied
Quality Assurance	<ul style="list-style-type: none"> • Centre staff not fully aware of policies and procedures • There is inadequate monitoring or review of procedures
Records	<ul style="list-style-type: none"> • Accurate records of Learners, qualifications and achievements not maintained or retained • Course, qualification and Learner registrations are not submitted in line with deadlines
Resources	<ul style="list-style-type: none"> • Appropriate resources required for delivery and assessment not in place • ICM is not notified of changes to personnel • Communication within the assessment team and/or with the Awarding Body is not effective • Equipment and accommodation do not comply with health and safety acts

Level 2 Sanction

Centre agreement category	Issue
Quality Assurance	<ul style="list-style-type: none"> • Appropriate staff and policies detailed in Centre recognition still not in place • Unit specifications not fully understood or adhered to
Records	<ul style="list-style-type: none"> • Learner registration does not follow our requirements
Resources	<ul style="list-style-type: none"> • Specified required resources for delivery and assessment not in place
Compliance	<ul style="list-style-type: none"> • Standards in the Centre are inconsistent with standards in partner organisations • Lower level sanction has not been adequately addressed

Level 3 Sanction

Centre agreement category	Issue
Quality Assurance	<ul style="list-style-type: none">Inadequately qualified staff are engaged in delivering ICM awards
Compliance	<ul style="list-style-type: none">Centre fails to provide access to requested information, records, Learners work, Learners and staff within reasonable timeframeExam material compromised (e.g. not stored correctly)Non-payment of invoicesLower level sanction has not been adequately addressed

Level 4 Sanction

Centre agreement category	Issue
Malpractice	<ul style="list-style-type: none">Investigation and action planning arising from malpractice/maladministration is not an effective preventative measureSignificant malpractice/maladministration identified
Quality Assurance	<ul style="list-style-type: none">Centre not complying with requests for monitoring and investigationSignificant faults in the management and quality assurance of a specific programme(s)Standards in the Centre are inconsistent with standards in partner organisations
Records	<ul style="list-style-type: none">Significant concerns over storage and use of Learner information and data
Compliance	<ul style="list-style-type: none">Significant faults in the management and quality assurance of some ICM programmesLower level sanction has not been adequately addressed

Level 5 Sanction

Centre agreement category	Issue
Malpractice	<ul style="list-style-type: none">Centre not assisting with investigation into malpractice/maladministrationSignificant malpractice/maladministration identified
Withdrawal	<ul style="list-style-type: none">Centre not following withdrawal process correctly
Compliance	<ul style="list-style-type: none">Centre does not comply with policies and proceduresLower level sanctions not acted on/actions set not adhered to/corrective measures consistently not put in place over a period of timeSignificant faults in the management and quality assurance of all ICM programmes