



End Point Assessment Policies

Sanctions Policy
GP05



Document History

Version	Date	Reason for Revision	Issued by
V1.1	July 2019	Initial release	Harj Dhanjal GP05
V1.2	Nov 2020	Document review during covid-19 (No changes identified)	Harj Dhanjal GP05
V1.3	July 2021	Reviewed for our Ofqual recognition application	Alan Bates GP05
V1.4	Feb 2024	External policy review and update	Alan Bates GP05
V1.5	July 2025	Review of policy and updates	Alan Bates

Area	Update
Regulatory Alignment	Explicit reference to Ofqual General Conditions of Recognition (2025), especially Conditions A, B, C, and G.
Terminology	All references to IFATE replaced with Skills England .
Equality Act 2010	Added reference to the Public Sector Equality Duty and inclusive practices.
Policy Review Section	Clarified that the review ensures compliance with updated regulatory and equality frameworks.



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Sanctions Policy

1. Introduction and purpose

This policy explains how and when the United Centre of Excellence (UCE) will impose sanctions. It lists the types of sanctions applied as a result of a non-compliance, whether as a result of malpractice, maladministration or otherwise.

The purpose of the Sanctions Policy is ultimately to avert adverse effects to Learners / apprentices. An effective sanctions policy prevents further exposure to non-compliance by imposing restrictions on the activity of the centre, apprentice employer or training provider, until such time that the risk of non-compliance is either resolved, removed or mitigated.

Sanctions may be applied as a result of non-compliance with the requirements of regulators (Ofqual), funding bodies (Education and Skills Funding Agency) regulated guidance (Skills England) as well as UCEs own policy and procedures.

As an EPAO we do not have approved centres, but work under a contract for services with Employers and their training providers. Sanctions are imposed on the employer as they are the employer of the apprentices and the organisation that has selected UCE as their EPA service provider. If the employer chooses to contract services to organisations, other than the EPA organisation, such as a training provider, they can only do so in line with the ESFA rules on sub-contracting and with the acknowledgement that the responsibility remains with them.

2. Definition

A sanction is a restrictive action that aims to address and, where possible, prevent or mitigate non-compliance with the rules, regulations and requirements governing the assessment of qualifications or end point assessment.

3. Policy statement

As an Ofqual recognised end point assessment organisation we are committed to ensuring that end point assessment and any other assessment is valid, authentic and reliable. UCE will ensure that adequate resources are made available to promote this policy effectively. Our policies represent our commitment to ensure there are no adverse effects to Learners and, should that be the case, that Ofqual is informed of any such adverse effect in a timely manner.





4. Scope

The policy applies to centres (employers and training providers) who are failing to comply with UCE requirements. Internal incidents of non-compliance are not in scope of this policy e.g. where UCE experts or independent assessors deliver the EPA, internal UCE disciplinary procedures will apply.

5. Legislation and compliance

The policy relates to conditions A, B, C and G of the Ofqual General Conditions of Recognition.

6. Responsibilities

All staff have a responsibility to give full and active support for the policy by ensuring the policy is known, promoted, understood and implemented.

Employers and training providers should be fully aware of the contents of the policy and its possible implications should there be a failure to comply with requirements specified by UCE in relation to the delivery of EPA and to meet the requirements of the ESFA, Skills England and the published assessment plan.

The UCE Senior Team is responsible for oversight of the policy and for ensuring a standardised approach to the imposition of sanctions.

7. Approach to Sanctions

UCE 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 public confidence in UCE service delivery.

UCE 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 technical experts 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.





Sanctions may be imposed when:

- 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 UCE or the Skills England
- Cancellation of planned audit without a legitimate reason.

This is not an exhaustive list.

8. Application of Sanctions

Sanctions will be applied in an escalating level of effect. It is the responsibility of the UCE Operations Director 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 UCE will be reviewed and endorsed by the Senior Team. UCE will not impose sanctions without providing the employer with an opportunity to address the area of non-compliance. Should sanctions be unavoidable, UCE will take all reasonable steps to protect the interests of any apprentices currently registered on the Standard(s). Our process also includes consideration of adverse effects and how and when we inform Ofqual.

Level 1 sanctions

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

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

Level 2 sanctions

- Relocation of EPAO activities (for, example, the current facilities are inadequate for quality EPA delivery)
- Delay to the delivery of EPA activities, until evidence has been provided e.g. until gateway requirements are met
- Removal of approval of the Employers' representative technical expert to be part of EPA activities
- Preventing any further registrations on the standard in question, whilst still permitting the employer to continue to register Learners on other standards.



Level 3 sanctions

- Prevention of further apprentice registrations for EPA on all standards the Employer / training provider offers

Following the imposition of a sanction the person assigned to investigate and manage the sanction application process will complete a report for review by the Senior Team. The Senior Team will evaluate whether there has been a notifiable adverse effect and, if so request that the Responsible Officer reports this to Ofqual.

Level 3 sanctions will always be reported to the Skills England and if there has been an adverse effect, the sanction will additionally be reported to Ofqual. In cases of wilful malpractice or fraud there may be a need to report the matter to the police. See the UCE Malpractice and Maladministration Policy.

9. Disagreements

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

10. Removal of Sanctions

UCE aims to remove / reduce sanctions as soon as possible. We do this by working with the Employer / training provider by providing an action plan or action points which must be completed to the satisfaction of the UCE Operations Director, 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 UCE, e.g., the Skills England or Ofqual, but we will inform Employers if this is the case and work with Employers to be in a position to remove / reduce the sanctions expeditiously.

11. Monitoring and Evaluation; activities designed to reduce the need for sanctions

Our monitoring procedures are activities designed to reduce the risk of the need to apply sanctions. In order to ensure consistency and minimise the risk of sanctions being imposed, UCE carries out a range of monitoring, planning and training activities. The following is not an exhaustive list:

- Provide advice and support on the interpretation of the published standard and assessment plan
- Risk rate the experience and competence and provide training for the Employers' technical experts



- 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, which includes conflict of interest mitigation)
- Provide guidance on the gateway to enter EPA (eligibility requirements)
- Provide appropriate documentation and guidance to support independent assessment
- Produce EPA tools e.g. standardisation and moderation
- Monitor results of apprenticeship by EPA activity and independent 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, valid, sufficient, and reliable and that the standards are being consistently maintained, ensuring assessment plan requirements are fully met
- Validation checks of evidence and apprentice information / records ahead of any claim for certification.

12. Policy review

This policy and procedure will be reviewed, and updated as required but not less than annually, by the UCE Senior Team.

The review of the policy and procedure aims to ensure that lessons are learnt following the application of sanctions, opportunities for continuous improvement are identified and that the procedure continues to be consistent with regulatory criteria (Ofqual, ESFA, Skills England).

This policy has been updated to align with the Ofqual General Conditions of Recognition (2025), particularly Conditions A, B, C, and G. It also reflects the latest guidance under the Equality Act 2010, including the Public Sector Equality Duty and inclusive practices.

This policy review ensures compliance with the 2025 Ofqual Handbook and incorporates inclusive language and practices in line with the Equality Act 2010. All references to IFATE have been replaced with Skills England to reflect the current regulatory landscape.