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| Triton Training Limited | System of Work | PAGE ISSUE DATE REVIEW | Page 1 of 9 Eight 06/01/2025 06/01/2026 |
| TITLE: ATC Malpractice and Maladministration Policy | | APPROVED BY: Directors | |

1. Malpractice and Maladministration Policy

Triton Training are committed in its service provision to offer the highest quality, ensuring access to fair assessment for all learners.

This policy applies to:

- Learners
- Triton Training Team Members (e.g. staff, educators, volunteers, sub-contractors, consultants or any other representative).

2. Definition

Malpractice is any deliberate or neglectful act which undermines the integrity and validity of a course or assessment. Malpractice can occur at Triton Training as an approved training centre and at learner level. 'Malpractice' (which incorporates plagiarism, use of AI tools, maladministration and non-compliance) means any act, default or practice which is a breach of the Regulations or which:

- 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 awarding bodies, Triton Training or any employee, sub-contractor or representative of awarding bodies or Triton Training.

3. Policy Aim and Purpose

The aim of this policy is to safeguard the integrity and credibility of all courses, activity and training delivered by Triton Training. To ensure that any potential malpractice or maladministration is identified, prevented, corrected and/or mitigated in every aspect of the delivery, development and assessment of all individuals engaged with the assessment, delivery and assessment of courses, activities and training delivered

This policy provides a framework for the identification and management of malpractice and maladministration by:

- Providing the means to identify and resolve malpractice and maladministration
- Establishing clear standards for dealing with malpractice and maladministration
- Reducing the possibility of malpractice and maladministration.
 - Reducing the possibility of learner plagiarism.

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This policy applies to Triton Training as an Approved Training Centre, Triton Training workforce, learners and any other individual involved with the delivery and assessment of courses, activities and training delivered.

4. Types of Malpractice & Maladministration

The following list gives some examples of the types of incidents that may occur (this list is not exhaustive due to the nature and range of possible incidents that are likely to occur):

Malpractice concerning Triton Training ATC

Examples of malpractice could include:

- Wrongful claiming of certification in full knowledge that the Learner has not met the standards of the qualification(s).
- Deliberate failure to carry out internal quality assurance processes and monitoring in line with the ATC Service Level Agreement (SLA), SEQ Centre Handbook/IQA guidance, SEQ Monitoring Guide and/or SEQ Guide to Delivering Qualifications or any SEQ related documentation.
- Intentional withholding or omission of information to comply with the Centre Approval Process.
- Insecure and/or inappropriate storage of assessment instruments, materials and marking guidance linked to any of SEQ qualifications.
- Misuse of assessments (including assessment achievement record), including inappropriate adjustments to assessment decisions.
- Failure to comply with requirements for accurate and safe retention of Learner evidence, assessment and internal verification records.
- Failure to comply with Awarding organisation procedures for managing and transferring accurate Learner data, such as LEE auditing checks.
- Deliberate falsification of records in order to claim certificates.
- Deliberate falsification of records or misuse of data to gain SEQ centre approval.
- Persistent insufficient management of administrative processes and record keeping.
- Failure to co-operate with an investigation.

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- Breach(es) in Data Protection law.

Malpractice concerning Triton Training Staff

- This means malpractice committed by a current (or former) member of staff (or contractor) working on behalf of Triton Training.

Examples could include:

- A breach of security (e.g., failure to keep material secure, tampering with coursework etc.)
- Excessive direction from assessors to Learners during summative assessments (e.g., prompting Learners in assessments by means of signs or verbal or written prompts).
- Breach of confidentiality (e.g., failure to maintain confidentiality of assessment materials or personal data).
- Deception (e.g., manufacturing evidence of competence, fabricating assessment or internal verification records).
- The provision of improper assistance to Learners (e.g., permitting the use of a reasonable adjustment over and above the extent permitted by SEQ policy).
- Provision of inaccurate or misleading information by Centre staff about SEQ qualifications.
- Failure to adhere to regulations/SEQ stated requirements.

Malpractice concerning the Learner

Malpractice by a Learner relating to internal assessment could occur in the following areas:

- portfolios of internal assessment evidence.
- presentation of practical work.
- preparation and authentication of coursework.
- conduct during an internal assessment.

Examples of Learner malpractice could include:

- Plagiarism - failure to acknowledge sources properly and/or the submission of another person's work as if it were the Learner's own.
- Collusion with others when an assessment must be completed by individual Learners and/or evidence must relate to that individual Learner.

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- Copying from another Learner (including using ICT to do so).
- Impersonation - assuming the identity of another Learner or a Learner asking another person to assume their identity during an assessment.
- Inclusion of inappropriate, offensive, discriminatory, or obscene material in assessment evidence. This includes vulgarity and swearing that is outside of the context of the assessment, or any material of a discriminatory nature (including racism, sexism and homophobia).
- Inappropriate behaviour during an internal assessment that causes disruption to others. This includes shouting and/or aggressive behaviour or language.
- Frivolous content - producing content that is unrelated to the question in worksheets or online coursework.
- The procurement of evidence from a third party (e.g., essay mill, ghost writing, AI) which is submitted as the Learner's own work.
- Irrespective of the underlying cause or the people involved, all allegations of malpractice in relation to delivery and assessment need to be investigated in order to protect the integrity of the SEQ qualification and to be fair to the SEQ ATC and all Learners.

Maladministration

The term maladministration relates to any administrative activity, neglect, default or other practice by Triton Training that results in the ATC or Learners not complying with the specified requirements laid out in the policies and procedures for delivery of the qualifications and/or other courses awarded by SEQ. Maladministration can occur by mistake, or unintentionally.

Types of Maladministration

Examples of maladministration by Triton Training may include:

- Spelling errors when registering learners.
- Errors and omissions in course paperwork (e.g., incorrect or incomplete assessment decisions, omission of feedback to learners, unsigned declarations, undated feedback etc).
- Not adhering to learner registration and certification procedures, i.e., Late learner registrations (both occasional and persistent).
- Insufficient evidence and recording of Learner Existence and Eligibility checks (LEE).

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- Late submission of Learner work for marking or moderation (i.e., not within a reasonable timescale of that work being completed and, where relevant, marked and internally verified).
- Failure to maintain appropriate and legible records for audit purposes and external monitoring.
- Providing incorrect or inaccurate information to Learners regarding SEQ qualifications, and progression to further SEQ qualifications or other SEQ related courses.
- Incorrectly or mistakenly claiming a unit or qualification result/certification including any other course(s) for a Learner.
- Presenting a Learner's work for assessment or moderation when it is not the work of that individual.
- Presenting CVs of uncontracted staff during the ATC centre approval application process.

5. Investigation and Management of Malpractice and Maladministration

The procedures in place by Triton Training as an Approved Training Centre, coupled with quality assurance controls (internal verification and centre review), have been carefully designed to monitor Triton Training's arrangements and ability to competently deal with preventing and investigating any instances of malpractice or maladministration.

Triton Training has established a process for investigating alleged cases that have been raised.

- The specific details of the malpractice and maladministration are brought to the attention of The Triton Training Quality Manager by email and by the person who identifies this or wishes to report this, which could be the person directly involved, such as a learner who know the tutor is assessing a learner who is known to them or a learner who a tutor suspects is using AI. Details of this should be sent to info@tritontraining.co.uk.

Specific details should include the nature of the malpractice and maladministration and any other key information.

- The Triton Training Quality Manager will identify an investigating officer who will consider the details of the potential malpractice and maladministration and any appropriate interventions.
- The outcomes of this will be recorded and placed on file including the interventions and impact of these within 20 working days.
- If the investigation decides that either malpractice or maladministration has taken place the relevant awarding body will be notified immediately.
- Learner checks will be carried out by tutor on day one of every course and will be recorded using the Triton Training learner checks form.

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- If required the Triton Training Quality Manager or Directors will double check paperwork and Learner identification to ensure no malpractice or maladministration has taken place.

On all occasions when information regarding an allegation is received by Triton Training, it will be treated as a potential case for malpractice or maladministration until an outcome has been reached through the investigation stage.

- The Triton Training Directors are accountable for assessment arrangements that lead to the achievement of qualifications.
- The Triton Training Directors are responsible for ensuring that any team members involved in learner Induction are trained this policy.
- The Triton Training Directors will ensure that all team members are aware of their responsibilities to prevent malpractice and follow the ATC and SEQ procedures regarding administration, delivery and internal verification.
- The Triton Training Directors will report any irregularities to the relevant awarding body in writing immediately after they are discovered.
- Triton Training will co-operate fully with any investigations and in all cases will keep all affected team members and learners informed of the process throughout.

Stage 4: Management of confirmed cases of malpractice or maladministration

Triton Training will aim to provide feedback within 30 working days of confirmation of the confirmed cases of malpractice or maladministration. In some cases the investigation may take longer, for example, if action from the relevant awarding body or regulatory authority is required. In such instances all concerned parties will be advised of the revised timescale.

In cases where certificates are deemed to be invalid, the relevant awarding body will inform Triton Training of any actions that need to be taken.

Stage 5: Appeals

Triton Training have an appeals procedure that can be applied if there is disagreement in the outcome of a malpractice/maladministration investigation. An appeal must be based on reasonable grounds which relate directly to the case in question.

The following would be accepted as reasonable grounds:

- The case was not dealt with using the published policy and procedure.
- Further evidence (including medical evidence) has come to light which changes the basis of the decision.

The following do not, by themselves constitute grounds for an appeal:

- The individual did not intentionally cheat

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- The individual has an unblemished academic record
- The individual regrets his/her actions. Triton Training reserves the right to reject an appeal at this point if there is not any further evidence to consider or if the grounds for the appeal are weak or unjustified. Further information on appeals may be found in the Appeals Policy.

6. Updates of Procedure

| Issue | Written, Checked and Approved | Issue Date | Action by |
|-------|-------------------------------|------------|-----------------|
| 1 | Written, Checked and Approved | 09/05/2019 | Krystal Buckley |
| 2 | Checked and Approved | 01/01/2020 | Krystal Buckley |
| 3 | Checked and Approved | 01/01/2021 | Krystal Buckley |
| 4 | Checked and Approved | 12/03/2021 | Krystal Buckley |
| 5 | Checked and Approved | 01/01/2022 | Krystal Buckley |
| 6 | Checked and Approved | 01/01/2023 | Krystal Buckley |
| 7 | Amended and Approved | 06/01/2024 | Krystal Buckley |
| 8 | Amended and Approved | 06/01/2025 | Krystal Buckley |

7. Internal Documents & Forms

1. Learner Assessment Prior to Learning
2. Learner Induction Form
3. Learner Individual Learning Plan
4. Learner Progress Report
5. Learner Exit Interview
6. Appendix 1.
7. Triton Training AI check form.

8. Sources of Information

1. RLSS UK Guidance Documents. <https://www.rlss.org.uk/policies>
RLSS UK Compliance Team: 0300 3230 096 or compliance@rlss.org.uk
2. Swim England Guidance Documents: <https://www.swimenglandqualifications.com/our-policies/>
Swim England Quality Assurance: qualityassurance@swimenglandqualifications.com
3. STA Guidance Documents. <https://www.safetytrainingawards.co.uk/policies>
STA Compliance Team: compliance@safetytrainingawards.co.uk
4. YMCA Guidance Documents. <https://www.ymcaawards.co.uk/policies-and-procedures/>
YMCA Support Team: awards.support@ymca.co.uk

Appendix 1:

Examples of Malpractice

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The following list is not exhaustive however it provides the types of categories and most common examples of malpractice that should be prevented.

1. Unacceptable Evidence

- Inappropriate, offensive or obscene material in assessment evidence.

2. Collusion / Collaboration

- Working collaboratively with other learners beyond what is permitted.

3. Plagiarism / Copying

- Unacknowledged copying from published sources (including the internet).
- Incomplete referencing.
- Copying from another learner (including the misuse of IT & AI).

4. False Declarations

- Making a false declaration of authenticity.
- Theft of somebody else's work to pass it off as the learners own.

5. Inauthentic Evidence / Tampering

- Destruction of work.
- Claiming to have lost learners work.
- Alteration or falsification of results, documents, assessments, including pre-requisite certificates.

6. Personation

- Use of the wrong name or identification number (such as registration number / candidate number).
- Impersonating another individual.
- Arranging to be impersonated.

7. Financial Fraud

- Attempting to obtain certificates fraudulently.
- Attempted bribery.

8. ATC Notification Failure

- ATC failure to notify, investigate and / or report to SEQ allegations of suspected malpractice.
- ATC failure to take action as required by SEQ as detailed in this document, or to co-operate with SEQ investigations.

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9. Assessor / Tutor Discretion Failure

- Giving improper assistance to learners.
- Vocationally Related Qualifications (VRQ's) observations by non-competent staff.

10. External Consultant Failure

- External consultant incompetence.
- Deception.
- Failure to disclose a Conflict of Interest.

11. ATC Failure

- Failure to carry out delivery, assessment or internal verification in accordance with SEQ requirements.
- Failure to use licensed tutors / assessors.

12. Failure to meet the ATC SLA

- Failure to adhere to SEQ administration requirements (such as learner registrations).
- Insecure storage of assessment materials.
- Failure to disclose a Conflict of Interest.
- Failure to meet learner pre-requisites.

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