



Defence Awarding
Organisation



DAO Sanctions Policy

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Recognising Quality and Competence:

Supporting Defence with accreditation and specialist bespoke qualification opportunities

Contents

Introduction.....2

Scope2

Awarding Centre’s Responsibility2

Review Arrangements2

Ensuring Standards of DAO Qualifications and Units.....2

Approach to Sanctions2

Levels of Sanctions4

Imposing Sanctions on DAO Awarding Centres4

Imposing Sanctions on DAO Learners5

Dormancy5

Ensuring Approach Consistency6

Awarding Centre Support6

Introduction

1. This policy is aimed at DAO Awarding Centres delivering DAO approved Qualifications or Units and who have failed to meet aspects of the DAO delivery requirements and/or the standards laid down by the Regulatory Authorities in respect of Regulated Qualifications and Units. It sets out the Sanctions the DAO may impose on Awarding Centres in such situations.
2. It is also for use by the DAO staff to ensure they apply any Sanctions in a consistent manner.

Scope

3. This Sanctions Policy covers DAO Learners, DAO Awarding Centres or members of the public that may wish to make a complaint in relation to DAO qualifications and associated services offered by the DAO.

Awarding Centre's Responsibility

4. It is important that all Awarding Centre staff involved in the delivery of DAO qualifications are fully aware of the contents of this policy and its possible implications on an Awarding Centre should it fail to comply with requirements specified by the DAO in relation to the delivery of DAO qualifications (some of which are required of the DAO by the Regulators).

Review Arrangements

5. The DAO will review the policy annually as part of the DAO self-evaluation arrangements and revise it as and when necessary, in response to customer feedback, trends from internal monitoring arrangements, changes in practices, actions from the Regulatory Authorities or external agencies or changes in legislation.
6. Feedback on this policy can be sent to the DAO via the points of contact detailed at the end of this document.

Ensuring Standards of DAO Qualifications and Units

7. The DAO has a responsibility to DAO Learners taking DAO qualifications and the UK Regulatory Authorities to ensure that Awarding Centres deliver DAO Qualifications and Units in accordance with relevant National standards.

Approach to Sanctions

8. The DAO has a range of Sanctions that can be imposed. The decision on the most appropriate level of sanction will be contingent upon various factors, including the gravity of the situation, the performance of the Centre, the potential risk to the interests of DAO learners, and the preservation of the integrity of the DAO qualifications and units.
9. The DAO aims to ensure that the application of Sanctions is a last resort and through its approach to Awarding Centre support and management, and the development of

appropriate action plans, the DAO will work with Awarding Centres to prevent situations arising that would warrant a Sanction being imposed.

10. However, if Sanctions are required then the DAO will not hesitate to apply them – with the Sanction(s) being applied depending on the nature of the situation. For example, if the Awarding Centre has:
- a. Outstanding actions
 - b. No and/or poor records to confirm assessment decisions.
 - c. No lead Internal Quality Assurance (IQA) in place
 - d. Proven collusion or persistently poor assessment of Awarding Centre marked assessments.
 - e. Suspected or proven cases of Maladministration/Malpractice at the Awarding Centre and/or the services provided by the Awarding Centre and/or its satellite Centres or third parties.
 - f. Made certification claims before DAO Learners have completed the unit(s)/qualification(s)
 - g. An increased likelihood of an Adverse Effect occurring (eg something that is likely to have an Adverse Effect on the standards of the qualifications they are delivering or public confidence in qualifications)¹
 - h. Refused access to premises and/or records to the staff of DAO or the Regulatory Authorities
 - i. Breached any requirement contained in the DAO Awarding Centre Handbook affecting Awarding Centre recognition and/or qualification approval.
 - j. Application submitted by the Awarding Centre and accepted by DAO in such a manner as to reasonably justify doubts about the ability or intention to deliver DAO qualifications and services in accordance with the terms of outlined in the application(s)
11. It is important to note that the following are not classified as Sanctions, but standard good Awarding Organisation or business practice and they may be applied instead of a formal Sanction and/or alongside a Sanction:
- a. When an Awarding Centre is first recognised and approved by the DAO to offer DAO qualifications, and/or if they have subsequently applied and been approved to offer another qualification in a sector or qualification type that is significantly different from previous qualifications they offer, the DAO will approve the Awarding Centre to offer the qualification(s) and not process any certificate claims for the product(s) until the Awarding Centre has received a satisfactory monitoring visit. This approach is normal practice amongst Awarding Organisations and is generally seen as good practice and is intended to help ensure the Awarding Centre is delivering the 'new' qualification effectively before certificates can be issued.
 - b. Undertaking additional visits to an Awarding Centre to provide them with a greater level of support and/or monitoring depending on their needs and performance.
 - c. Requiring specific Awarding Centre staff to undergo additional training and/or scrutiny by the Awarding Centre if there are concerns about their ability to undertake their role in the delivery of DAO qualifications effectively. Such decisions would normally be communicated to the Awarding Centre via an 'Action' following an Awarding Centre engagement visit. It is important to note that the DAO reserve the

¹ This meets the requirement for [Ofqual GCoR Condition: A8.2](#)

right to impose a number of restrictions against individuals at any time. Ordinarily restrictions would be imposed against individuals either during or prior to conducting an investigation into Maladministration or Malpractice connected to an Awarding Centre with whom the individual(s) is/are connected. Restrictions imposed on individuals may prohibit them from participating in the delivery and assessment of DAO qualifications for a designated period.

Levels of Sanctions

12. The following table summarises the levels of Sanction that will be determined by DAO, or its representatives, as to the level of transgression that has occurred:

Sanction Level	Sanction Type	Rationale for Sanction	Risk Levels
1	Non-Compliance with Awarding Centre Approval / Handbook	No threat to the integrity of assessment decisions. (<i>Actions Issued</i>)	Low Risk
2	Suspension of Registration	Threat to the integrity of assessment decisions (<i>Including Mapping</i>)	Medium Risk
3	Suspension of Registration and Certification	Loss of the integrity of assessment decisions and/or risk of invalid certification claims	High Risk
4	Removal of approval for specific qualification(s)	Iterative breakdown in management and quality assurance of <u>specific</u> approved qualification(s)	Very High Risk
5	Withdrawal of Centre Approval, (<i>Regulator informed</i>)	Iterative breakdown in management and quality assurance of <u>all</u> approved qualification(s)	Immense Risk

Table 1: DAO Levels of Sanctions

Imposing Sanctions on DAO Awarding Centres

13. Sanctions that may be imposed as part of an Awarding Centre recognition/qualification approval decision, monitoring activity or investigation into a complaint, appeal, or allegation of Malpractice and/or Maladministration. Sanctions may include **withholding certificates (eg suspending certification status)** or **preventing further DAO Learner registrations by suspending:**

- a. A single qualification
- b. An entire qualification sector.
- c. An entire qualification type.
- d. All qualifications

14. Recommendations in relation to the above types of Sanctions will be evaluated by the **DAO Compliance Manager** should there be clear evidence of non-compliance by the Awarding Centre and/or a sufficient rationale for the Sanction will be imposed on the Awarding Centre.

15. In all instances, the nature of the Sanction and the rationale for its application will be communicated in writing to the Awarding Centre via the DAO Qualification Management System (DAO QMS). If an Awarding Centre contests the decision, the initial point of contact will be the **DAO Compliance Manager**.

16. Only in exceptional circumstances of extremely serious non-compliance or the persistent failure of the Awarding Centre to address outstanding actions, and/or the failure of previous Sanctions to address the issue, would DAO impose, via the **DAO Compliance Manager**, the ultimate Sanction of **removal of qualification approval** in relation to:
- a. A single qualification
 - b. An entire qualification sector.
 - c. An entire qualification type.
 - d. All qualifications and in turn the Awarding Centre’s ‘recognition’ with DAO.
17. The DAO anticipates that it would not impose the immediate withdrawal of approval for a qualification or range of qualifications without:
- a. providing an Awarding Centre with the opportunity to rectify the identified area(s) of non-compliance.
 - b. Initially imposing one of the previous sets of Sanctions
 - c. Established evidence constitutes a significant threat to the interest of DAO Learners or the integrity of DAO Qualifications and Units.
18. Should an Awarding Centre have its approval for a qualification/suite of qualifications removed, the DAO will take all reasonable steps to protect the interests of any DAO Learners registered on the qualification(s) at the time. For example, DAO will either recognise achievement to date with certification and/or seek to transfer the learners where possible, to another Awarding Centre to enable them to continue the qualification².
19. In addition, upon the removal of approval, the Awarding Centre shall:
- a. immediately cease to offer DAO qualifications and services.
 - b. immediately cease to operate as an Awarding Centre recognised/approved by DAO, and shall immediately cease to describe, promote, market or advertise itself as an Awarding Centre approved by and/or offering the relevant qualification(s)/service(s).

Imposing Sanctions on DAO Learners

20. Should a DAO Learner be found to have committed Malpractice then the following sanctions may be imposed in accordance with the arrangements outlined in the DAO Malpractice and Maladministration policy (which would be communicated to the Learner by DAO and/or the Learner’s Awarding Centre):
- a. Issuing a written warning that if the offence is repeated further action may be taken.
 - b. Loss of all marks/credits for the related work/unit
 - c. Disqualification from the unit(s)/qualification(s)
 - d. Placing a ban from taking any further qualifications with the DAO (eg for a set period of time)

Dormancy

21. A dormant Awarding Centre is defined as an Awarding Centre that has been given approval but;

² This meets the requirement for [Ofqual GCoR Condition: C2.4](#)

- a. has not registered DAO Learners for a period of 12 months
- b. has no registered DAO Qualifications for a period of 12 months

Ensuring Approach Consistency

- 22. The length of time any of the above Sanctions will be imposed will depend on the situation that warranted their introduction.
- 23. The **DAO Compliance Manager** will be responsible for regularly reviewing the application and maintenance of Sanctions to ensure they continue to be appropriate and proportionate to the incident(s) and risk of future incidents occurring.

Awarding Centre Support

- 24. Policies for handling Enquiries, Appeals, Malpractice and Maladministration are available on the DAO website and the DAO Qualification Management System (QMS)
- 25. The DAO will work with Awarding Centres to deliver a customer-focused and professional service to DAO Learners. DAO policies are reviewed annually. Any queries about the contents of the policy, please contact the DAO Compliance Team via:

DAO website

<https://www.gov.uk/government/groups/defence-awarding-organisation>.

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