ENERGY & ENVIRONMENT AWARDS

Sanctions Policy

Version 3
October 2026

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1. Purpose

This policy sets out the framework used by Energy & Environment Awards (EEA) to determine when sanctions may be imposed and how they will be applied. It supports the protection of learners and the integrity, validity and reliability of EEA qualifications and assessments.

The policy explains the circumstances in which sanctions may be considered, the evidence and factors EEA will take into account, the range of sanctions available, and the steps required to manage, review and, where appropriate, remove a sanction.

Sanctions will be determined objectively on a case-by-case basis and applied fairly, consistently and proportionately, having regard to the available evidence, the seriousness and impact of the non-compliance, and any risk to learners, qualification standards or EEA's regulatory compliance.

This policy should be read alongside the EEA Centre Agreement and relevant mandatory policies, including the Malpractice and Maladministration Policy. Failure to comply with those requirements may itself constitute malpractice, maladministration or a breach of the Centre Agreement and may result in action under this policy. In doing so, the policy ensures that:

- Learners are protected, including through action to prevent or mitigate adverse effects.
- Qualification and assessment standards are maintained.
- EEA can meet its regulatory obligations and protect public confidence in its qualifications.

2. Scope

This policy applies to EEA-approved centres and all individuals involved in the administration, delivery, assessment and quality assurance of EEA products, including centre staff, trainers, assessors, internal quality assurers, learners, EEA staff and external quality assurers.

It applies to all qualifications, end-point assessments and apprenticeship assessment qualifications, and covers related activities from centre approval and learner registration through to delivery, assessment, quality assurance and certification.

The policy applies where non-compliance with EEA requirements, the Centre Agreement, or mandatory EEA policies is identified or suspected through external quality assurance monitoring, due diligence, investigation into potential maladministration or malpractice, complaints, appeals, or other EEA activities.

Sanctions may be applied to a centre or, where relevant, to an individual within the scope of EEA's authority. Matters involving suspected malpractice or maladministration will also be considered under the Malpractice and Maladministration Policy, as appropriate.

Where EEA has reasonable grounds to suspect criminal conduct, or obtains credible evidence of such conduct, it will refer the matter to the police, relevant regulator or other appropriate authority and will cooperate with any subsequent investigation, where lawful and appropriate.

3. Responsibilities

3.1 Centre responsibilities

EEA-approved centres must ensure that all relevant personnel involved in the administration, delivery, assessment and quality assurance of EEA qualifications, end-point assessments and apprenticeship assessment qualifications are made aware of:

- the EEA requirements relevant to their role
- the requirements set out in this policy
- the potential consequences for the centre if those requirements are not met.

The Centre Agreement sets out the responsibilities that approved centres must fulfil to enable EEA to meet its regulatory requirements. Centres must ensure that they are familiar with the contents of the agreement, understand the obligations that apply

to them, and comply with its requirements throughout their approval and delivery of EEA qualifications and assessments.

EEA approved centres must take all reasonable steps to prevent malpractice and maladministration in the delivery and assessment of EEA qualifications and assessments. Where malpractice or maladministration is identified or suspected, centres must notify EEA promptly and take reasonable steps to prevent or mitigate any actual or potential adverse effect. Further requirements are set out in EEA's Malpractice and Maladministration Policy, found on the website here.

1.1.1 Actions arising from External Quality Assurance activity

Where EEA assigns actions following monitoring activity, including an external quality assurance visit, the centre must complete the required work to address the areas for improvement identified within the agreed timescale.

The Head of Centre is responsible for ensuring that each action is assigned to the appropriate staff member, assessor or internal quality assurer and completed by the agreed date.

Where an action is not completed as required, EEA may impose a sanction, which will remain in place until the action has been resolved.

3.2 EQA / Associate responsibilities

Where an EQA or other associate identifies non-compliance through monitoring or assurance activity, they must record the findings and supporting evidence and may recommend that EEA applies a sanction. The recommendation must be based on the evidence available and reflect the nature and seriousness of the issue. A recommendation does not constitute a decision to impose a sanction; EEA will review the findings and make the final decision in accordance with this policy.

3.3 EEA responsibilities

EEA is responsible for complying with the General Conditions of Recognition and taking appropriate action where malpractice or maladministration is identified.

Where monitoring or any other assurance activity identifies that a centre has not met EEA requirements, EEA is responsible for assessing the nature, seriousness and impact of the issue and determining whether a sanction is required. Any sanction will be applied fairly, consistently and proportionately, taking account of the risk to learners, qualification standards and EEA's regulatory compliance.

EEA will determine and apply any sanction, monitor progress against the required actions and supporting evidence, and only lift the sanction when it is satisfied that the identified issues have been resolved and the risk of recurrence has been appropriately addressed.

4. Sanctions process

1.2 Sanction levels

EEA will determine and apply sanctions fairly and proportionately on a case-by-case basis, taking account of the nature and seriousness of the issue. The levels available are set out in the table below.

The examples provided in the table below are not exhaustive. EEA may apply a sanction in other circumstances where this is considered necessary and proportionate. All sanctions will be accompanied by written notification setting out the reasons for the sanction, any required actions the centre must complete, the evidence required and the arrangements for review. Where appropriate, this will take the form of a formal action plan.

Where EEA considers that there is an immediate or significant risk to learners, assessment integrity, qualification standards or regulatory compliance, it may impose an interim sanction while enquiries or an investigation are completed. Any interim sanction will be kept under review and will remain in place only for as long as EEA considers it necessary and proportionate.

EEA is not required to apply sanctions sequentially. It may apply any level of sanction considered proportionate to the seriousness, impact and risk of the issue. EEA may escalate, reduce or combine sanctions where this is justified by the evidence and circumstances.

EEA will notify the centre or individual of decisions in writing. The notification will set out the sanction imposed, the reasons for the decision, its effective date, the activities or qualifications affected, any required actions and evidence, review arrangements, and the right of appeal.

Level	Sanction	Triggers
1	Centre Action Plan to be issued.	**Triggered where:** EEA identifies an administrative or procedural weakness that requires correction but has not affected qualification or assessment outcomes. **Examples include:** • missing or incomplete policies, • delayed notification of staff changes, • incomplete assessment planning, or • minor record-keeping issues.
2	Enhanced external quality assurance monitoring, which may include additional sampling, monitoring or centre visits.	**Triggered where:** EEA identifies weaknesses that could affect quality assurance or compliance if they are not addressed, and closer external scrutiny is required to manage a potential risk to assessment outcomes. **Examples include:** • insufficient assessor or IQA capacity, • poor standardisation, • overdue IQA activity, • incomplete learner records, or • failure to complete Level 1 action-plan requirements within the agreed timescale.
3	Suspension of Suspension of approval for one or more qualifications and/or suspension of learner registration, assessment activity or certification.	**Triggered where:** EEA identifies an actual risk to assessment integrity, the validity of a qualification, learner interests, or the valid and authentic award of qualifications, including where a centre is unable or unwilling to resolve identified issues. **Examples include:** • unqualified assessors making assessment decisions, • ineffective IQA arrangements, • failure to follow assessment requirements, or

		• repeated or unresolved Level 2 action-plan requirements within the agreed timescale.
4	Withdrawal of Qualification Approval for specific qualifications.	**Triggered where:** EEA identifies a serious or irretrievable breakdown in the management, quality assurance or administration of one or more specific qualifications, creating a significant risk to assessment integrity or the valid award of those qualifications. It may also be triggered where a recovery plan has failed, or EEA no longer has confidence in the centre's controls for the affected provision. **Examples include:** • systemic assessment malpractice affecting specific provision, • falsification of records, • failure to cooperate with an investigation, • widespread invalid assessment decisions, or • management or financial pressure that compromises assessment decisions.
5	Withdrawal of Centre Approval.	**Triggered where:** EEA identifies an irretrievable breakdown in the centre's management and quality assurance across its approved provision, resulting in a complete loss of confidence in the centre's ability or willingness to deliver EEA qualifications compliantly and protect the valid award of qualifications. **Examples include:** • deliberate fraud, • repeated or widespread malpractice, • refusal to engage with EEA, • continuing serious regulatory or contractual breaches, • failure to remedy lower-level sanctions, or

		• conduct that presents a significant risk to learners, qualification standards or EEA's reputation.

4.1 How long do sanctions apply for?

There is no fixed timescale for a sanction to remain in place. EEA will specify how and when the sanction will be reviewed and what required actions, evidence or assurance will be required before it can be varied or lifted.

EEA will keep the sanction and any associated required actions under ongoing review, taking account of progress made and the evidence provided. Before considering whether a sanction can be lifted, all required actions must be completed, and EEA must have sufficient assurance that appropriate and effective controls are in place to address the identified issues and reduce the risk of recurrence.

5. Right of Appeal

Where a centre or individual considers that a sanction is unreasonable, they may appeal the decision in accordance with EEA's Enquiry about Results and Appeals Policy, found on the website here. The appeal must set out the reasons for appealing the decision and include any supporting evidence.

A sanction will normally remain in effect while an appeal is considered unless EEA determines that suspending or varying it would be appropriate and would not create an unacceptable risk.

Due to the nature of a sanction appeal, the process will begin at Stage 2 of the policy. An independent appeals panel will consider the appeal, review the relevant evidence and issue a final decision.

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