



Malpractice and Maladministration Policy

National Talent Academy Limited

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2.0	February 2026	National Talent Academy	Redrafted to reflect TQUK endorsement and current

			organisational structure
2.1	September 2026	National Talent Academy	Extended the window for submitting an appeal against a malpractice or maladministration decision from 10 to 20 working days, aligning it with the Enquiries and Appeals Policy. Added a document control block recording the document owner, status, date published, next scheduled review and contact. Set the review frequency to annual. Corrected the description of certification: TQUK issues the certificate for the full Level 3 Award and NTA issues certificates for individual units, including the mandatory unit. Changed programme duration from GLH to hours TQT, in line with the agreed terminology standard, and removed the separate mandatory-unit hours figure pending confirmation.

For use in National Talent Academy policy development

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1. Introduction

1.1 About National Talent Academy

National Talent Academy (NTA) is an educational technology company providing online qualifications in essential work skills for 16-to-19-year-olds and adult learners in Further Education colleges, schools and training providers across the UK.

NTA was founded in 2020 by Cambridge graduate David Jaffa, who previously founded SAM Learning (online GCSE/KS3 revision used in hundreds of UK schools) and Penda Learning (online science/maths for US schools, sold 2019). David received the 2021 BETT Outstanding Achievement Award for his lifetime achievements in EdTech.

1.2 Purpose of This Policy

This policy sets out how National Talent Academy identifies, investigates and manages cases of suspected or actual malpractice and maladministration in relation to its endorsed qualification: the Level 3 Award in Essential Work Skills, endorsed by Training Qualifications UK (TQUK) as a Certified Learning Course (CLC).

NTA treats all cases of suspected malpractice and maladministration very seriously and will investigate all suspected and reported incidents. The purpose of this policy is to:

- Define what constitutes maladministration and malpractice.
- Set out how allegations are reported, investigated and resolved.
- Establish the roles and responsibilities of NTA and its delivery partners.
- Ensure the integrity of the assessment process and the validity of the certificates issued by NTA and by TQUK.
- Protect learners, delivery partners and the wider education sector.
- Align with the requirements of TQUK as the endorsing awarding organisation.

1.3 Scope

This policy applies to all activities related to the delivery, assessment and certification of the NTA Level 3 Award in Essential Work Skills (35 hours TQT in total, comprising the mandatory unit and the 30-hour Level 3 Award). It covers:

- NTA staff and associates.

- Delivery partners, including FE colleges, schools, sixth forms and training providers.
- Learners enrolled on NTA programmes.
- Any other individuals involved in the delivery or assessment of NTA qualifications.

1.4 Qualification Context

The Level 3 Award in Essential Work Skills is an unregulated qualification endorsed by TQUK as a Certified Learning Course (CLC). It is delivered fully online via the NTA platform as a self-paced learning programme. Certification is split between the two organisations: TQUK issues the certificate for the full Level 3 Award on completion, subject to learners meeting the pass threshold, and NTA issues certificates for individual units, including the mandatory unit. The qualification fits within the tailored learning envelope for 16-19 study programmes.

The platform provides an automatic evidence trail captured for internal and external quality assurance purposes.

1.5 Review and Availability

NTA reviews this policy annually. It may also be revised at any point in response to changes in legislation, changes in practice, guidance issued by TQUK or other external bodies or feedback from learners, delivery partners and other stakeholders. Copies are available on request at hello@nationaltalent.org or via www.nationaltalent.org.

2. Defining Maladministration and Malpractice

2.1 Maladministration

Maladministration is any activity or practice that results in non-compliance with the National Talent Academy contract and/or specific requirements for the delivery of NTA programmes.

Maladministration generally covers mistakes or poor process where there has been no deliberate intention on the part of the person responsible to cause harm. It may involve some degree of incompetence, carelessness or inexperience. Examples include, but are not limited to:

- Avoidable delays in administration or reporting.
- Mistakes arising from inattention.

- Faulty or inadequate procedures.
- Failure to follow correct procedures.
- Poor record keeping.
- Inadvertent failure to act.
- Poor communication.
- Inadvertently giving misleading or inadequate information.

Where possible, NTA will work with delivery partners to prevent maladministration from occurring. However, delivery partners are expected to have adequate systems in place and adhere to these systems. Recurring instances may be escalated and treated as malpractice.

2.2 Malpractice

Malpractice is any activity or practice that is unethical and/or illegal that compromises, or could compromise, the integrity, reputation and/or validity of the assessment process, certificates, results, NTA, the delivery partner or the wider education sector.

Malpractice generally involves some form of intent, although it may also include circumstances where an individual has been negligent or reckless as to the consequences of their actions. Examples include, but are not limited to:

- Cheating, or facilitating cheating, in an assessment.
- Attempting intentionally to manipulate a result so that it does not reflect the learner's actual performance.
- A learner passing off someone else's work as their own (plagiarism).
- A tutor providing a learner with answers or aiding learners beyond what is permitted.
- Deliberately failing to apply the correct marking criteria.
- A tutor or learner falsifying a result.
- Sharing or revealing confidential assessment materials in advance.
- Claiming to have and/or offering to share confidential assessment materials.
- A learner breaching the rules of assessment.
- Fabrication of evidence or falsification of records.
- Bias or discrimination in the assessment process.

Malpractice could occur at learner, staff and/or organisation level and may have greater implications than maladministration. NTA treats all cases of potential malpractice very seriously.

2.3 The Spectrum Between Maladministration and Malpractice

Although maladministration and malpractice are distinct, the two concepts can exist on a spectrum and may sometimes shade into one another. A conscious decision to commit any act described under maladministration may constitute malpractice. Regardless of where on the spectrum any incident falls, NTA will apply this policy consistently and proportionately.

2.4 Adverse Effects

NTA considers risks caused by adverse effects, maladministration and malpractice. An adverse effect is any act, omission, event, incident or circumstance that:

- a) Gives rise to prejudice to learners or potential learners.
- b) Adversely affects the ability of NTA or TQUK to maintain the standards, integrity or public confidence in the qualifications delivered.

Under the NTA contract, all parties involved in programme delivery are made aware of their obligations, including the specific duty not to compromise NTA's ability to fulfil its obligations as a TQUK endorsed centre. It is therefore important that adverse effects, maladministration and/or malpractice are reported to NTA and dealt with appropriately.

3. Identifying Possible Maladministration or Malpractice

3.1 Who Can Identify Potential Maladministration or Malpractice?

Anyone can come across an issue that they think could constitute potential maladministration or malpractice, including but not restricted to:

- Learners.
- NTA staff.
- Delivery partners (FE colleges, schools, sixth forms and training providers).
- External agencies such as the Education and Skills Funding Agency (ESFA), Ofsted and the Police.
- Anonymous informants.

NTA may also identify cases of maladministration and/or malpractice through its routine quality assurance processes, including monitoring the automatic evidence trail captured through the NTA platform.

Unless there is a reason not to do so, NTA will notify relevant delivery partners when an allegation of maladministration or malpractice is received. If the notification implicates an individual, NTA may notify another suitable person at the organisation involved.

3.2 Anonymous Allegations

NTA may receive allegations of maladministration and/or malpractice from a person who wishes to remain anonymous and/or does not disclose contact details. Provided there is enough information to act upon, NTA may still investigate the allegation.

4. Reporting Instances of Maladministration or Malpractice

4.1 How to Report

To ensure that NTA has all correct details and facts, any suspected or actual case of maladministration or malpractice should be reported using the Notification of Maladministration and Malpractice Form (Appendix A of this policy). If delivery partners have already completed their own internal investigation and collated evidence to support or refute an allegation, this should also be submitted alongside the form.

Reports should be sent to NTA at: hello@nationaltalent.org

4.2 Information Required

The notification form will require the following information:

- The dates of the alleged or suspected maladministration or malpractice.
- Organisation and delivery partner details.
- The people involved.
- Details of the affected assessment or programme area.
- The details of the alleged or actual maladministration or malpractice.

NTA will need to understand whether other learners, assessment locations and/or delivery partners may have been affected by the incident, as NTA may be required to inform TQUK or other relevant parties.

4.3 Timescales for Notification

Delivery partners must notify NTA immediately after they identify, or are made aware of, potential maladministration or malpractice or as soon as possible thereafter. If they have not been able to report immediately, the reason for any delay should be provided when making contact.

4.4 What NTA Will Do Upon Receiving a Report

NTA will review the report and any evidence and determine whether any further action is needed. If a delivery partner has submitted their own investigation report and there is information NTA requires that has not been captured, NTA will make contact to request the necessary information.

NTA will aim to complete its initial review within 10 working days of receiving the formal report. Where this is likely to take longer, for example if a visit is required, NTA will advise of the revised timescale.

From the information and evidence available, NTA will reach an informed decision to either:

- Take no further action.
- Instruct the delivery partner to conduct a full or further investigation into the suspected or proven case(s) and submit a written report.
- Refer the incident to relevant parties (e.g. TQUK, ESFA, the Police).
- Investigate the incident directly.

Where required, NTA will notify TQUK as the endorsing awarding organisation.

5. Investigation of Potential Maladministration or Malpractice

5.1 What Is an Investigation?

An investigation comprises a review of the report, together with any additional relevant data. From this, an informed decision can be made on whether any further action or investigation is needed, or if a sanction is required.

5.2 General Principles of Investigations

NTA expects all investigations, whether conducted by NTA or by delivery partners, to be:

- Rigorous and thorough.
- Effective and proportionate.
- Transparent and fair.
- Risk-based.

Investigations should be undertaken by persons of appropriate competence who have no personal interest in the outcome.

5.3 If NTA Carries Out an Investigation

NTA may investigate any allegation of maladministration and/or malpractice. This may be in addition to a delivery partner's investigation. Under the NTA contract, delivery partners are required to cooperate fully with NTA in any investigation.

An NTA investigation may include one or more of the following approaches (this list is not exhaustive):

- Telephoning and/or visiting delivery partners to establish facts.
- Reviewing or collecting information, including data from the NTA platform's automatic evidence trail.
- Arranging for an NTA representative to carry out a visit.
- Carrying out interviews (face-to-face, by telephone or remotely) with persons relevant to the investigation.
- Requesting in writing any further information as necessary.

NTA will aim to access and retain original evidence or information. If original records cannot be retained, NTA will take copies and record them as authentic.

5.4 If NTA Asks Delivery Partners to Investigate

NTA may ask delivery partners to carry out a further internal investigation. If so, NTA will specify what is required and within what timescales. Delivery partners must keep NTA updated on progress.

Delivery partners must appoint a suitable person to conduct the investigation, under NTA guidance, and should ensure that any potential or actual conflicts of interest are avoided. In the event that a conflict of interest is identified, it should be reported to NTA immediately.

If any concerns come to NTA's attention which could compromise or prejudice the investigation, NTA will take appropriate and proportionate action to ensure the integrity of the investigation is preserved.

5.5 Interviews

For interviews conducted as part of any investigation:

- Any delivery partner's personnel or learner being interviewed may be accompanied by another person. The individual must be advised of this right in sufficient time before the interview.
- Delivery partners must ensure that young persons (16-to-19-year-olds) and vulnerable adults are accompanied by an appropriate adult at all times during an interview.
- NTA must be made aware in sufficient time if any person providing legal representation or advice is to be present at an interview.

5.6 NTA's Rights During an Investigation

NTA reserves the right at any time, and in particular during or following an investigation, to:

- Suspend delivery of a programme by a delivery partner.
- Withhold results for assessments.
- Withhold claims for learner certification with TQUK.
- Invalidate an assessment.
- Take any other necessary, appropriate and proportionate action.

6. Outcomes and Findings of an Investigation

6.1 Draft Report

If NTA has asked a delivery partner to carry out an investigation, the delivery partner will provide NTA with a draft report detailing findings and outcome within the timescales determined by NTA.

NTA will review the draft report for factual accuracy within the specified timescales. Should this review result in required substantial change, NTA will advise the delivery partner in writing and retain this information on record.

If NTA investigates directly, NTA will provide the delivery partner with a draft report detailing findings and outcome. Delivery partners have 10 working days from receipt to review and comment on the report for factual accuracy. Should the review result in required substantial changes, delivery partners should advise NTA in writing.

A record of factual accuracy, including any disagreements noted by either party, will be retained. This record will be referred to in any subsequent investigations and may be provided to relevant persons, including TQUK.

6.2 Final Report

NTA will produce a final summary report outlining the outcome and/or findings of the investigation(s). NTA will make an informed decision in determining whether or not maladministration and/or malpractice has occurred and, if so, the appropriate action to be taken.

If an external party notified NTA of the allegation, NTA will inform them of the outcome of the investigation without unduly breaching confidentiality.

6.3 Investigation Decisions and Outcomes

The decision and outcome following the investigation(s) may include the following:

Decision	Outcome
Maladministration or malpractice not demonstrated to have occurred	No further action will be taken under this policy.
Maladministration or malpractice likely to have occurred	If there is insufficient evidence to prove the occurrence of maladministration and/or malpractice, but enough to suggest either may have occurred, NTA may still act and/or direct delivery partners to act.
Maladministration or malpractice demonstrated, or on the balance of probabilities is highly likely or proven to have occurred	NTA will act proportionately to the seriousness, impact and/or frequency of occurrence. NTA may also direct delivery partners to act.

7. Appealing Against a Decision or Action

Delivery partners may appeal against NTA's decisions relating to any action to be taken against a learner or a delivery partner following an investigation into maladministration and/or malpractice.

Appeals should be submitted within 20 working days of notification of NTA's decision.

Please refer to the National Talent Academy Enquiries and Appeals Policy for further details, which is available from NTA on request or via www.nationaltalent.org.

8. Roles and Responsibilities

In the event that either NTA or a delivery partner is notified of suspected or proven cases of maladministration or malpractice, each party is responsible for ensuring that all facts are established to determine whether the allegation can be proven and, if necessary, carry out an investigation and take appropriate action. NTA will work with all relevant people, including delivery partner staff and external parties such as TQUK.

8.1 What Delivery Partners Will Do

- Notify NTA immediately of any potential maladministration and/or malpractice.
- Advise anyone implicated that an allegation has been made against them.
- Advise those persons that they have the right to reply to any allegations.
- Advise those persons that they have the right to appeal against any sanctions imposed.
- Comply with all requests for information in the timescales stated by NTA.
- Notify NTA if any personnel involved in the matter leave the organisation.
- Carry out an investigation, where appropriate and/or as directed by NTA.
- Provide NTA with a report of any investigation undertaken, including detail and outcome(s).
- Fully cooperate with any NTA investigation.
- Implement required actions as a result of the investigation.
- Inform learners and staff affected of the implications of any actions and sanctions.
- Take appropriate action to prevent reoccurrence.
- Retain relevant documentation securely in line with data protection legislation and archiving policies.
- Ensure policies and procedures are in place to manage maladministration and malpractice, providing evidence of these to NTA on request without delay.
- Respect the confidentiality of information and comply with data protection legislation.

Failure to comply with these requirements constitutes malpractice in itself and will be dealt with accordingly.

8.2 What National Talent Academy Will Do

- Oversee all investigations into suspected or proven cases of maladministration or malpractice.
- Advise anyone implicated that an allegation has been made against them.
- Advise those persons that they have the right to reply to any allegations.
- Advise those persons that they have the right to appeal against any sanctions imposed.

- Take all reasonable steps to prevent or mitigate the impact and effects of maladministration and/or malpractice.
- Support delivery partners by providing guidance on how best to investigate, deal with and prevent maladministration and/or malpractice.
- Provide delivery partners with a report or summary on the outcome of the investigation.
- Apply appropriate sanctions in line with NTA's Sanctions Policy.
- Work with delivery partners to ensure that maladministration and/or malpractice does not reoccur.
- Inform TQUK and other relevant third parties as appropriate.
- Retain records and documentation during and after the completion of investigations in line with data protection legislation.

9. Contact Information

If you have any queries relating to this policy, please contact National Talent Academy:

Email: hello@nationaltalent.org

Website: www.nationaltalent.org

Address: 3rd Floor, 1 Ashley Road, Altrincham, Cheshire, WA14 2DT

Appendix A: Notification of Maladministration and Malpractice Form

Use this form to report any actual or suspected malpractice or maladministration relating to programmes delivered through National Talent Academy.

Before completing this form, please read the NTA Malpractice and Maladministration Policy in full.

Once completed, sign and forward the form together with any supporting evidence to: hello@nationaltalent.org

Section A: Delivery Partner Details

Delivery partner name:

Delivery partner address:

Postcode:

Qualification/programme title:

Section B: Details of Occurrence

Date of occurrence:

Please give specific details of the actual or suspected occurrence of malpractice or maladministration you are reporting, and list any supporting documents submitted with this form. Continue on a separate sheet if needed.

Description:

Please also include (if possible):

- The names and job titles (if applicable) of tutors/assessors/IQAs/delivery partner staff involved.
- The names (if known) of anyone else affected by the occurrence being reported.

Supporting documentation attached? Yes / No

Section C: Your Details

Please indicate your role:

Role	Please Tick
Training Provider / Centre	
Employee	
Learner	
Tutor	
Assessor / IQA	
Other (please specify)	

Print name:

Contact telephone number:

Email address:

Signature:

Date:

NTA will keep your identity in the strictest confidence; however, NTA may need to contact you during the course of any investigations.