



Sanctions Policy

National Talent Academy Limited

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2.0	February 2026	National Talent Academy	New policy created to support TQUK

			endorsement requirements and quality assurance framework
2.1	September 2026	National Talent Academy	Added a document control block recording the document owner, status, date published, next scheduled review and contact. Set the review frequency to annual. Replaced the stated record retention period with a reference to the NTA Data Retention Schedule. 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.
2.2	September 2026	National Talent Academy	Updated the name of the Equity, Diversity and Inclusion Policy in the list of related policies, following its renaming. No other change.

For use in National Talent Academy policy development

Table of Contents

1. Introduction.....	4
1.1 About National Talent Academy.....	4
1.2 Purpose of This Policy.....	4
1.3 Scope.....	4
1.4 Key Definitions.....	5
1.5 Review and Availability.....	5
2. Triggers for Sanctions.....	5
3. Levels of Sanctions – Delivery Partners.....	6
4. Sanctions Affecting Learners.....	7
5. Process for Applying Sanctions.....	8
5.1 Identification and Risk Assessment.....	8
5.2 Notification.....	8
5.3 Corrective Action and Monitoring.....	8
5.4 Duration of Sanctions.....	9
6. Withdrawal of Delivery Partner Approval.....	9
7. Responsibilities.....	10
7.1 NTA Responsibilities.....	10
7.2 Delivery Partner Responsibilities.....	10
8. Appeals.....	10
9. Notifying TQUK.....	10
10. Related Policies.....	11
11. Contact Information.....	11

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 16–19 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 the sanctions NTA may impose on delivery partners, their staff and learners where there has been a failure to comply with NTA's policies, procedures or the terms of any delivery partner agreement with NTA.

The purpose of applying sanctions is to:

- Minimise the risk to the integrity of NTA's awarding functions, specifically in relation to the awarding of results and certificates.
- Ensure the integrity and veracity of certificates awarded.
- Allow NTA, and TQUK as the endorsing awarding organisation, time to investigate potential maladministration and/or malpractice whilst maintaining the integrity of the qualification.
- Protect learners from any adverse effects arising from non-compliance.
- Protect the reputation and standing of NTA and its qualifications.

NTA aims to ensure that the application of sanctions is a last resort. Through its approach to delivery partner support and quality assurance, NTA will work with delivery partners to prevent situations arising that would warrant a sanction being imposed.

1.3 Scope

This policy applies to:

- NTA delivery partners (FE colleges, schools, sixth forms and training providers) delivering NTA qualifications.
- Staff employed or sub-contracted by delivery partners who are involved in the delivery, assessment or quality assurance of NTA programmes.

- Learners who are registered on NTA programmes.
- NTA staff, for the purpose of ensuring consistent application of sanctions.

This policy applies to the NTA Level 3 Award in Essential Work Skills, which is an unregulated qualification endorsed by Training Qualifications UK (TQUK) as a Certified Learning Course (CLC), as well as any other products and services provided by NTA. TQUK issues the certificate for the full Level 3 Award; NTA issues certificates for individual units, including the mandatory unit.

1.4 Key Definitions

Sanction: An action imposed by NTA on a delivery partner, their staff or a learner in response to non-compliance with NTA's policies, procedures or the terms of any agreement with NTA.

Non-compliance: A failure to comply with NTA's policies, procedures or the terms of the delivery partner agreement or any action or omission that poses a risk to the integrity of NTA's awarding function.

Adverse effect: An act, omission, event, incident or circumstance that gives rise to prejudice to learners or potential learners or adversely affects the standards of qualifications, NTA's ability to deliver qualifications appropriately or public confidence in qualifications.

1.5 Review and Availability

NTA will review this policy annually and may revise it in response to changes in legislation, feedback, best practice or guidance issued by TQUK or other external bodies. Copies are available on request at hello@nationaltalent.org or via www.nationaltalent.org.

2. Triggers for Sanctions

Sanctions may be imposed where NTA has determined that there is an issue of non-compliance. The following table provides examples of non-compliance that may lead to sanctions being applied. This list is not exhaustive.

Delivery Partner Non-Compliance	Learner Non-Compliance
Failure to meet the terms of the delivery partner agreement with NTA.	Plagiarism or copying of another learner's work.
Outstanding or overdue actions from quality assurance activities.	Collusion with other learners or third parties.
No internal quality assurer (IQA) in place	Cheating or attempting to manipulate

or no evidence of IQA monitoring. Poor records to confirm assessment decisions. Failure to adhere to NTA assessment or quality assurance requirements. Making certification claims before learners have completed the qualification. Suspected or confirmed malpractice or maladministration. Refusal of access to premises and/or records for NTA or TQUK quality assurance purposes. Failure to cooperate with NTA or TQUK investigations. Conduct that may bring the qualification or NTA into disrepute.	assessment results. Submitting work that is not the learner's own. Misrepresentation of evidence or supporting documentation. Disruptive or inappropriate behaviour on the NTA platform. Breach of assessment conditions. Failure to comply with programme rules communicated at induction.
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3. Levels of Sanctions - Delivery Partners

NTA operates a graduated approach to sanctions. Sanctions will be imposed in a proportional and consistent manner, with the level of sanction reflecting the seriousness of the non-compliance, the delivery partner's track record and the risk to learners and the integrity of the qualification.

NTA reserves the right to apply sanctions at any level depending on the circumstances. In cases of serious non-compliance, NTA may move directly to a higher level of sanction without having first imposed a lower level.

Level	Sanction	Typical Triggers
Level 1: Action Plan	Written notification to the delivery partner advising of the non-compliance and the corrective action required. An action plan with clear timescales is agreed. NTA monitors progress against the action plan.	Minor administrative non-compliance. Outstanding or overdue actions from quality assurance activities. Incomplete learner records or documentation.
Level 2: Restrictions	Suspension of learner registrations and/or certification claims for the affected qualification(s) until issues are resolved. Increased monitoring by NTA, which may include additional	Failure to complete Level 1 action plan within agreed timescales. Poor assessment records or evidence of inadequate IQA. Non-compliance with NTA assessment or quality assurance requirements.

	quality assurance visits or sampling. Requirement for specific staff to undertake additional training or re-standardisation.	Concerns about the validity of assessment decisions.
Level 3: Suspension	Full suspension of the delivery partner's ability to register learners, submit assessment outcomes or claim certificates for NTA qualifications. NTA may require the delivery partner to arrange alternative provision for affected learners. An investigation is conducted and the delivery partner must cooperate fully.	Failure to resolve Level 2 restrictions within agreed timescales. Suspected or confirmed malpractice or maladministration. Refusal of access to records or premises. Serious breach of the delivery partner agreement.
Level 4: Withdrawal	Withdrawal of the delivery partner's approval to deliver NTA qualifications. NTA notifies TQUK as the endorsing awarding organisation. The delivery partner must make arrangements for affected learners to complete their qualification with an alternative delivery partner.	Persistent failure to address non-compliance after previous sanctions. Confirmed serious malpractice or maladministration. Fundamental breach of the delivery partner agreement. Conduct that brings the qualification or NTA into disrepute.

4. Sanctions Affecting Learners

Where a learner is found to have committed an act of non-compliance or malpractice, the following sanctions may be imposed. These sanctions are applied in accordance with NTA's Malpractice and Maladministration Policy and are proportionate to the seriousness of the matter.

Sanction	When It May Be Applied
Written warning	First instance of minor non-compliance with assessment requirements, inappropriate conduct on the NTA platform or failure to follow programme rules.
Requirement to retake assessment	Where assessment evidence is found to be invalid due to plagiarism, collusion or other irregularity, and the learner is given the opportunity to resubmit.

Invalidation of assessment results	Where assessment results cannot stand due to confirmed malpractice, and the learner may or may not be permitted to retake depending on circumstances.
Disqualification from the programme	Serious or repeated malpractice, or conduct that threatens the safety or wellbeing of other learners or staff. Applied only in the most serious cases and with the Director's approval.

Before any sanction is imposed on a learner, the learner will be informed of the concern and given an opportunity to respond. Where the learner is aged under 18, the delivery partner and, where appropriate, the learner's parent or guardian will also be informed.

5. Process for Applying Sanctions

5.1 Identification and Risk Assessment

Non-compliance may be identified through NTA's quality assurance activities, external quality assurance by TQUK, reports from delivery partners or learners or through the NTA platform's automatic evidence trail, which captures a complete audit trail of all assessment activities.

When a potential issue of non-compliance is identified, NTA will undertake a risk assessment to determine the level of risk and the appropriate response. The risk assessment will consider the nature and severity of the non-compliance, its potential impact on learners and the integrity of the qualification and any previous history of non-compliance by the delivery partner or individual.

5.2 Notification

Delivery partners and/or learners will be informed in writing by NTA that a sanction is being applied. The notification will include:

- A clear description of the non-compliance identified.
- The sanction being imposed.
- The corrective actions required and the timescales for completion.
- The likely consequences should the corrective actions not be satisfactorily addressed.
- Information about the right to appeal.

5.3 Corrective Action and Monitoring

The delivery partner or learner must implement the corrective actions specified within the timescales set by NTA. Progress will be monitored. Sanctions will be reduced or lifted when the corrective action has been completed and NTA is satisfied that the level of risk has been reduced.

Should the corrective action(s) not be completed satisfactorily, NTA reserves the right to escalate the level of sanction. This could ultimately result in the withdrawal of the delivery partner's approval.

5.4 Duration of Sanctions

Sanctions will remain in place until the issues identified have been fully resolved to NTA's satisfaction. NTA will keep sanctions under regular review and will reduce or remove them as soon as it is satisfied that the risk has been adequately addressed.

6. Withdrawal of Delivery Partner Approval

Withdrawal of a delivery partner's approval to deliver NTA qualifications is the most serious sanction available and will only be imposed where NTA determines that there are exceptional circumstances of extremely serious non-compliance, persistent failure to address outstanding actions, and/or the failure of previous sanctions to address the issue.

Before withdrawing approval, NTA would normally expect to have:

- Given the delivery partner an opportunity to address the area(s) of non-compliance.
- First imposed one or more lower-level sanctions.

However, NTA reserves the right to impose immediate withdrawal in cases of serious misconduct that pose an immediate threat to learner safety, the integrity of qualifications or public confidence.

Where approval is withdrawn:

- NTA will notify TQUK as the endorsing awarding organisation.
- The delivery partner must make arrangements for affected learners to complete their qualification with an alternative NTA delivery partner, or NTA may arrange alternative provision.
- The delivery partner must provide NTA with details of all learners' current progress and any partially or fully completed units.
- The delivery partner must retain all records relating to NTA qualifications for the period set out in the NTA Data Retention Schedule.

7. Responsibilities

7.1 NTA Responsibilities

NTA will:

- Apply sanctions proportionately, consistently and transparently.
- Provide clear written notification of any sanction and the reasons for it.
- Monitor progress against corrective actions and review sanctions regularly.
- Reduce or remove sanctions promptly when the risk has been adequately addressed.
- Notify TQUK where sanctions may affect the endorsement of NTA qualifications.

7.2 Delivery Partner Responsibilities

Delivery partners must:

- Ensure that all staff involved in the delivery and assessment of NTA qualifications are aware of this policy.
- Comply with all sanctions imposed upon them within the timescales stated.
- Cooperate fully with NTA's investigations and quality assurance activities.
- Ensure that learners are informed about the consequences of non-compliance.
- Keep NTA informed of any changes that may affect their ability to meet the terms of the delivery partner agreement.

8. Appeals

Delivery partners and learners have the right to appeal against any sanction imposed by NTA. Appeals must be submitted in writing, stating the grounds on which the appeal is based. Please refer to NTA's Enquiries and Appeals Policy for full details of the appeals process.

A sanction will normally remain in force for the duration of the appeals process unless NTA advises otherwise.

9. Notifying TQUK

Where sanctions may affect the endorsement of NTA qualifications by TQUK, or where NTA becomes aware of information that may be relevant to other awarding organisations or external bodies, NTA will notify TQUK and/or the relevant body as appropriate.

NTA will cooperate fully with any investigation or monitoring activity conducted by TQUK in connection with sanctioned delivery partners.

10. Related Policies

This policy should be read in conjunction with the following NTA policies:

- Malpractice and Maladministration Policy.
- Enquiries and Appeals Policy.
- Complaints Policy.
- Internal Quality Assurance Procedure.
- Conflict of Interest Policy.
- Equity, Diversity and Inclusion Policy.

11. Contact Information

If you have any queries about the contents of 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