

Malpractice, Maladministration and Fraud Prevention Policy and Procedures

Policy Number:	ICCS-MMFP-V1-2025
Policy Owner:	Head of Quality Assurance
Approved By:	Senior Leadership Team
Approval Date:	November 2025
Next Review Date:	January 2027
Email:	info@iccs.uk

Content

- Introduction
- Purpose and Aims
- Legal and Regulatory Context
- Definitions and Scope
- Roles and Responsibilities
- Prevention of Malpractice, Maladministration and Fraud
- Detection, Reporting and Whistleblowing
- Investigation Procedures
- Outcomes, Sanctions and Remedies
- Record Keeping, Data Protection and Confidentiality
- Training, Awareness and Culture
- Relationship with Other ICCS Policies and External Bodies
- Monitoring, Review and Continuous Improvement

Introduction

International College of Contemporary Sciences ICCS is committed to maintaining the highest standards of integrity in all aspects of its academic, administrative and financial activities. The college recognises that malpractice, maladministration and fraud can undermine the fairness of assessment, damage the credibility of qualifications, erode trust in the institution and expose students, staff and stakeholders to serious risk. ICCS therefore adopts a zero tolerance approach to deliberate wrongdoing and seeks to create an environment in which honest conduct is the norm, controls are robust and concerns can be raised confidently and addressed promptly.

This Malpractice, Maladministration and Fraud Prevention Policy and Procedures document sets out the framework through which ICCS prevents, detects, investigates and responds to irregularities in assessment, certification and wider college operations. It explains the scope of the policy, defines key terms, clarifies roles and responsibilities and describes the processes for reporting and investigating concerns. The policy applies to all staff and students and to others who act on behalf of ICCS, including contractors and partners, and should be read alongside related policies on assessment, academic misconduct, quality assurance, data protection, whistleblowing and financial regulations.

Purpose and Aims

The purpose of this policy is to provide a clear and coherent framework that safeguards the integrity of ICCS academic and administrative processes and minimises the risk of malpractice, maladministration and fraud. It is intended to give assurance to students, staff, regulators, awarding organisations and other stakeholders that ICCS takes seriously its obligations to uphold ethical standards and that it has in place appropriate controls and procedures to prevent and address wrongdoing. The policy articulates how concerns will be considered, what protections are available for those who raise issues in good faith and what consequences may follow where misconduct is proven.

The aims of the policy are to promote a culture of honesty, transparency and accountability; to ensure that all members of the ICCS community understand what constitutes malpractice, maladministration and fraud; and to provide accessible mechanisms for reporting suspected cases. It also aims to ensure that investigations are conducted fairly, consistently and without undue delay, that outcomes are proportionate to the severity of the misconduct and that lessons learned are used to strengthen systems and reduce the likelihood of recurrence. In doing so, the policy contributes to

the protection of students and staff, the reliability of assessment outcomes and the reputation of ICCS and its qualifications.

Legal and Regulatory Context

ICCS operates this policy within a legal and regulatory framework that includes criminal law relating to fraud and bribery, employment law, data protection and obligations arising from contracts with awarding organisations and regulators. The Fraud Act 2006 and the Bribery Act 2010 set out offences relating to dishonest representation, abuse of position and offering, seeking or accepting bribes. The Public Interest Disclosure Act 1998 provides protection for workers who make certain disclosures of information in the public interest, often referred to as whistleblowing. ICCS expects staff and others acting on its behalf to act in accordance with both the letter and the spirit of these laws.

In relation to academic provision, ICCS has regard to the expectations of Ofqual and awarding organisations concerning the prevention and management of malpractice and maladministration in qualifications and assessments, as set out in conditions of recognition and associated guidance. The Office for Students and the Department for Education also expect providers to demonstrate strong governance and control arrangements that promote academic integrity and financial sustainability. ICCS reports cases of malpractice and maladministration to awarding organisations and regulators where required and cooperates fully with external investigations. This policy will be reviewed periodically to ensure alignment with evolving legal and regulatory requirements.

Definitions and Scope

For the purposes of this policy malpractice is defined as any act, default or practice which compromises, or attempts to compromise, the integrity of assessment, the validity of results or the reputation of ICCS or its partners. This may include collusion, plagiarism, impersonation, unauthorised access to assessment materials, falsification of records or certificates and failure to follow required procedures in a way that gives rise to unfair advantage or disadvantage. Malpractice may be committed by students, staff, contractors or others involved in the delivery or assessment of programmes and may be deliberate or, in some cases, the result of reckless disregard for rules and guidance.

Maladministration refers to any unintentional or negligent act, default or practice that leads to non compliance with regulations or procedures, potentially affecting the integrity of assessment or the delivery of qualifications. Examples include persistent administrative errors, failure to maintain accurate records, inadequate invigilation arrangements or incorrect communication of results. Fraud is a specific type of

malpractice that involves deliberate deception for personal or organisational gain, including financial fraud, falsification of expenses or misuse of assets. This policy applies to all such behaviours in the context of ICCS academic and related operations and covers activities on ICCS premises, online and at partner or placement sites where ICCS has responsibility.

Roles and Responsibilities

The Governing Body has ultimate responsibility for ensuring that ICCS has effective arrangements in place to prevent and manage malpractice, maladministration and fraud and for overseeing significant cases and associated risks. The Principal and senior leadership team provide strategic direction, ensure that appropriate policies, procedures and controls are established and resourced and promote a culture of integrity and accountability. Designated senior managers, such as the Head of Quality Assurance and the Head of Finance, have specific responsibilities for implementing this policy within their areas and for reporting material incidents to external bodies where required.

All staff, including academic and professional services colleagues, have a responsibility to familiarise themselves with this policy and with related procedures, to adhere to applicable regulations in their work and to remain alert to signs of possible malpractice, maladministration or fraud. They are expected to report concerns promptly through appropriate channels, without attempting to investigate matters themselves beyond initial fact finding. Students are responsible for complying with assessment regulations and academic conduct requirements and for avoiding behaviours that may constitute malpractice. Contractors, agents and partners acting on behalf of ICCS are expected to adhere to equivalent standards and to cooperate with investigations where their activities are under scrutiny.

Prevention of Malpractice, Maladministration and Fraud

Prevention is central to the ICCS approach. The college will design its systems, processes and controls to reduce opportunities for malpractice, maladministration and fraud and to make irregularities easier to detect. This includes clear documentation of procedures, segregation of duties in key processes, secure handling and storage of assessment materials and financial records, and use of appropriate technological safeguards. In assessment, preventive measures may include clear communication of academic integrity expectations, use of plagiarism detection tools, secure examination arrangements and moderation and verification procedures that deter and reveal irregular marking or recording of results.

Induction and training for staff and students will emphasise the importance of integrity and the consequences of malpractice and fraud, while also providing practical guidance on how to comply with procedures and avoid inadvertent errors. Regular review of systems and audits of compliance will be undertaken to identify vulnerabilities, and recommendations for improvement will be implemented in a timely way. ICCS will also foster an open culture in which concerns can be raised without fear, recognising that early identification and correction of issues are key to preventing more serious problems from developing.

Detection, Reporting and Whistleblowing

Despite preventive measures, there may be occasions when malpractice, maladministration or fraud is suspected or identified. ICCS encourages staff, students and others to report concerns promptly, whether they arise from irregularities observed in assessment, inconsistencies in records, unusual financial transactions or other suspicious activity. Concerns may be raised through line management, designated contacts in quality assurance or finance, or formal whistleblowing channels, in accordance with the ICCS whistleblowing or public interest disclosure arrangements. Reports may be made in writing or verbally and should include as much relevant detail as possible to support initial assessment.

ICCS will treat all reports seriously and will seek to protect the confidentiality of those who raise concerns, sharing information only with those who need it to investigate and respond. Individuals who make disclosures in good faith will not be victimised or disadvantaged for doing so, even if the concern is not ultimately substantiated, and any retaliation against whistleblowers will be treated as a disciplinary matter. Anonymous reports will be considered, although the ability to investigate and provide feedback may be more limited. The college will provide guidance on how and to whom concerns can be reported and will encourage a culture in which speaking up is seen as a positive contribution to integrity.

Investigation Procedures

When an allegation or suspicion of malpractice, maladministration or fraud is received, ICCS will undertake an initial assessment to determine the nature and seriousness of the concern, the potential impact and the appropriate course of action. This may include securing relevant evidence, such as documents or digital records, and considering whether immediate steps are needed to prevent further risk, such as temporarily suspending certain processes or access rights. If the matter appears to fall within the scope of this policy, a formal investigation will be initiated, led by a person or panel with appropriate expertise and independence from the alleged incident.

The investigation will follow a structured process that is fair, proportionate and consistent with applicable employment, student and data protection laws. Those who are the subject of allegations will be informed of the concerns and given an opportunity to respond, and they may be accompanied at meetings in line with ICCS procedures. Witnesses may be interviewed and relevant records examined, and all parties will be expected to cooperate fully. The investigation will seek to establish the facts on the balance of probabilities and will produce a report setting out findings, conclusions and recommendations. Timeframes will be communicated and, where possible, adhered to, recognising the need for both thoroughness and timely resolution.

Outcomes, Sanctions and Remedies

Following an investigation, ICCS will determine whether malpractice, maladministration or fraud has occurred and, if so, what actions are necessary. Where allegations are upheld, outcomes may include invalidation of assessment results, withdrawal or amendment of certificates, requirement for reassessment, or other academic remedies to protect the integrity of awards. Staff found to have engaged in misconduct may be subject to disciplinary action up to and including dismissal, in accordance with employment procedures, and students may face sanctions under student disciplinary or academic misconduct regulations, which may include warnings, suspension or expulsion.

In cases involving financial loss, ICCS may seek recovery of funds and, where appropriate, will report matters to law enforcement agencies or professional bodies. The college will also consider whether systemic weaknesses or gaps in procedures contributed to the incident and will implement remedial actions to strengthen controls and prevent recurrence. Where allegations are not upheld, reasonable steps will be taken to support those who have been the subject of investigation, and any inaccurate records will be corrected. ICCS will, where necessary, notify awarding organisations, regulators and other relevant bodies of confirmed cases and of actions taken, in line with contractual and regulatory obligations.

Record Keeping, Data Protection and Confidentiality

Accurate and secure record keeping is an essential component of effective malpractice, maladministration and fraud management. ICCS will maintain records of allegations, investigations, findings and outcomes in a manner that respects confidentiality and complies with data protection legislation and internal records management policies. Access to such records will be restricted to those who need it to undertake their duties,

and information will be retained only for as long as is necessary to meet legal, regulatory and audit requirements and to inform risk management and enhancement activity.

Data relating to individuals involved in cases will be processed fairly and lawfully, and those individuals will be informed about how their data will be used, subject to any legal constraints on disclosure. Aggregated and anonymised information about cases may be used to identify patterns and to support training and system improvement, and may be reported to governance bodies and external stakeholders where appropriate. ICCS will take steps to protect sensitive information from unauthorised access or disclosure, recognising that mishandling of such data can itself undermine trust and give rise to legal risk.

Training, Awareness and Culture

ICCS recognises that policies and procedures will only be effective if staff and students are aware of them, understand their implications and feel confident in applying them. The college will therefore provide training and guidance on malpractice, maladministration and fraud prevention as part of induction and ongoing professional development, tailored to the roles and responsibilities of different groups. Topics may include recognising warning signs, understanding regulatory requirements, managing conflicts of interest, handling assessment securely and using whistleblowing channels appropriately.

Awareness raising will also be integrated into student induction and academic skills development, with clear explanation of expectations in relation to academic integrity, use of sources, collaboration and the consequences of misconduct. ICCS will promote a culture that values honesty and accountability, celebrates good practice in integrity and encourages open discussion of ethical challenges. By embedding integrity into everyday discourse and practice, the college aims to reduce the likelihood of misconduct and to ensure that when issues do arise they are addressed in a spirit of learning as well as accountability.

Relationship with Other ICCS Policies and External Bodies

This policy sits alongside and interacts with a range of other ICCS policies and procedures, including those relating to assessment and academic misconduct, appeals, complaints, quality assurance, data protection, financial regulations, whistleblowing and staff and student disciplinary processes. In applying this policy, ICCS will consider carefully which procedures are most appropriate in a given case and how they should be sequenced or combined to achieve a fair and coherent outcome. For example, a case that begins as suspected academic misconduct may reveal wider procedural

weaknesses or potential fraud, requiring coordination between academic, quality and finance functions.

Where ICCS works with awarding organisations, regulators, professional bodies or collaborative partners, the requirements of those bodies in relation to malpractice, maladministration and fraud will also apply. ICCS will ensure that relevant external bodies are notified of incidents in accordance with contractual and regulatory obligations and will cooperate fully with external investigations or audits. Information about cases may need to be shared with partners where joint responsibilities exist, and agreements will set out how this will be managed. The college will also draw on external guidance from these bodies to refine its own practices and to ensure that its approach remains aligned with sector expectations.

Monitoring, Review and Continuous Improvement

The implementation and effectiveness of this Malpractice, Maladministration and Fraud Prevention Policy and Procedures will be subject to ongoing monitoring and periodic review. ICCS will analyse information about reported cases, including their number, nature, outcomes and timescales, in order to identify trends, recurring issues or areas of particular risk. This analysis will be considered by relevant committees and senior managers and will inform decisions about where additional controls, training or resources may be needed. Lessons learned from individual cases will be used to improve systems and to share good practice across departments.

A formal review of the policy will normally take place at least every two years, or sooner if there are significant changes in legislation, regulatory expectations or institutional context. Revisions will be developed in consultation with staff, students and other stakeholders as appropriate and will be approved through established ICCS governance processes. Updated versions of the policy will be communicated clearly and will be accompanied by guidance or training where required. The overarching aim is to ensure that ICCS continues to strengthen its culture of integrity and its capacity to prevent and respond effectively to malpractice, maladministration and fraud.

References

- Fraud Act 2006.
- Bribery Act 2010.
- Public Interest Disclosure Act 1998, in relation to protected disclosures and whistleblowing.
- Data Protection Act 2018 and the United Kingdom General Data Protection Regulation UK GDPR.

- Ofqual General Conditions of Recognition and awarding organisation regulations on malpractice and maladministration, where applicable.
- Office for Students regulatory framework expectations relating to academic integrity, governance and financial sustainability.
- Relevant guidance from the Department for Education and sector bodies on fraud prevention, public interest disclosure and academic integrity.

