



The only awarding body  
run *by* counsellors  
*for* counsellors

2024 - 2025

# CPCAB Sanctions Policy



# Sanctions Policy

## 1. Introduction

We are committed to working relationally with centres to meet all necessary requirements and will support centres to achieve this objective. However, this policy sets out the sanctions that may be applied, in a reasonable and proportionate way, in the event of non-compliance.

See also our policies on [Malpractice and Maladministration](#), [Complaints](#) and [Whistleblowing](#).

## 2. General Sanctions

Where there is any likelihood of a potential or actual Adverse Effect<sup>1</sup> arising from centre activity, where malpractice or maladministration has been alleged or identified or where a centre does not comply with the centre recognition requirements, we reserve the right to:

- carry out an additional quality assurance visit, for which there is an additional charge
- require a conflict of interest declaration ([form CR10](#)) and associated action plan to be provided
- withhold approval of group registrations
- withhold results
- withhold, recall or cancel the issuing of certificates
- withdraw approval for a tutor
- withhold the centre's Annual Practising Certificate
- withdraw centre recognition
- financial sanctions, including:
  - late candidate registration fee
  - fee for non-attendance at standardisation training day
  - minimum registrations sanction fee

For details of fees in each case, please see [CPCAB fees document](#)

---

<sup>1</sup> Ofqual's definition of an Adverse Effect': 'An act, omission, event, incident or circumstance has an Adverse Effect if it -

(a) gives rise to prejudice to Learners or potential Learners, or

(b) adversely affects -

(i) the ability of the awarding organisation to undertake the development, delivery or award of qualifications in accordance with its Conditions of Recognition,

(ii) the standards of qualifications which the awarding organisation makes available or proposes to make available, or

(iii) public confidence in qualifications.'

### 3. Sanctions Relating to Non-Payment of Invoices

Where centres are unable or not prepared to respond to requests for payment, we are firmly committed to sanctions relating to the centre, not to the candidate.

Non-payment of invoices will result in:

- First reminder will be sent via email from the CPCAB Portal after 30 calendar days of an invoice being issued. The invoice must be paid within 30 working days of being issued.
- Second reminder will be sent via email from the CPCAB Portal after 60 calendar days of an invoice being issued, detailing sanctions that may be applied.
- If payment has not been made and no contact from the centre has been received after a further 14 calendar days we will not approve new group registrations.
- Third reminder will be sent via email from the CPCAB Portal after 90 calendar days of an invoice being issued, detailing further sanctions that may be applied.
- If payment has not been made and no contact from the centre has been received after a further 14 calendar days we may withdraw centre recognition.

Sanctions do not include the withholding of certificates or quality assurance processes such as EV visits.

### 4. Withdrawal of Centre Recognition

In the event of a centre failing to respond to the additional support offered OR failing to meet any agreed action plan, we reserve the right to initiate the withdrawal of centre recognition as outlined below. The proposal for withdrawal of centre recognition and any appeal will be considered by a panel of senior CPCAB staff.

Any decision to withdraw centre recognition will only be made after a full discussion of all the circumstances regarding the integrity of the qualification, the interests of candidates and the reputation of CPCAB.

- The centre will be advised in writing of the reasons for, and the date of, the proposed action and will be invited to appeal in writing.
- The centre will be advised of the outcome in writing.
- Centre details will be removed from the CPCAB Centre Finder function on our website.
- The centre's Annual Practising Certificate will be declared invalid, meaning that the centre will not have the facility to make further registrations.

We will require the centre to take all reasonable steps to protect the interests of candidates registered on CPCAB qualifications following the requirements regarding contingency planning and centre withdrawal set out in Part 4 of the [Guidance for centre recognition for regulated qualifications](#) document.

It is a regulatory requirement that other awarding organisations and the regulators are notified in the event of withdrawal of centre recognition<sup>2</sup>. Depending on the individual circumstances of the case, the centre may be advised that they can re-apply for approval in the future once suitable remedial action has been taken.

This policy is reviewed as necessary and at least annually as part of the documentation update.

*CPCAB 2024*

---

<sup>2</sup> Ofqual General Condition A8.7 Where an awarding organisation has any cause to believe that an occurrence of malpractice or maladministration, or any connected occurrence –  
(b) may affect another awarding organisation, it must inform that awarding organisation.