

SPM Development Services Ltd

Conduct and Ending Engagement Policy

Reviewed and Updated: September 2026

Next Review: September 2027, or sooner if statutory guidance or SPM arrangements change.

Approved by: Simon Piper-Masha

Related Policies and Procedures

- Code of Conduct for Self-Employed Tutors
- Safeguarding and Child Protection Policy
- Safer Recruitment Policy
- Whistleblowing Policy
- Complaints Policy and Procedure
- Malpractice and Maladministration Policy
- Conflict of Interest Policy
- Lone Working and Home Visit Policy
- Privacy and Data Protection Policy

Purpose

SPM Development Services Ltd is committed to maintaining high standards of professional conduct, safeguarding and service delivery.

This policy explains how SPM will respond when concerns arise about the conduct, professional standards, or continuing suitability of a self-employed tutor, mentor, or other contractor working on behalf of SPM.

SPM will deal with concerns fairly, promptly, and proportionately, taking account of the nature and seriousness of the concern, any risk to learners, and any relevant contractual, safeguarding, commissioning, or awarding organisation requirements.

This policy does not create an employment relationship or an employee disciplinary procedure. Tutors and mentors engaged by SPM on a self-employed basis remain subject to the terms of their contractual engagement with SPM.

Scope

This policy applies to self-employed tutors, mentors and other contractors engaged by SPM Development Services Ltd.

It should be read alongside the SPM Code of Conduct and other relevant organisational policies. These set out the professional, safeguarding and operational standards expected of anyone working on behalf of SPM.

Concerns may arise through observation, complaints, safeguarding information, quality assurance, assessment or internal quality assurance activity, information from a commissioning organisation or awarding organisation, or through another reasonable source.

Expected Standards

Anyone working on behalf of SPM is expected to:

- comply with the SPM Code of Conduct and relevant organisational policies and procedures;
- maintain appropriate professional and safeguarding boundaries;
- act honestly, responsibly and in the best interests of learners;
- meet agreed professional, administrative and reporting requirements;
- maintain accurate records and protect confidential information;
- comply with safeguarding, safer working and lone-working arrangements;
- cooperate with reasonable monitoring, quality assurance, safeguarding and investigation processes;
- comply with relevant commissioning and awarding organisation requirements; and
- disclose information that may affect their ability or suitability to carry out work on behalf of SPM.

A failure to meet these standards may result in action under this policy or another relevant SPM policy.

Responding to Concerns

SPM will consider each concern individually and respond according to its nature and seriousness.

Where a concern is relatively minor and can appropriately be resolved informally, SPM will normally discuss the matter with the person concerned, clarify the expected standard and agree any necessary action.

This may include guidance, clarification of procedures, additional training or CPD, closer monitoring or another proportionate measure.

Where concerns are serious, repeated, unresolved informally, or informal action would not be appropriate, SPM may consider the matter formally.

The person concerned will normally be informed of the concern and given a reasonable opportunity to provide relevant information or explain their position before a decision is made.

SPM will keep an appropriate record of significant concerns, information considered, decisions made and any action taken.

Safeguarding Concerns and Allegations

Safeguarding concerns take priority over the ordinary process set out in this policy.

Any concern that a tutor, mentor or contractor may have harmed a child, may have posed a risk of harm, breached appropriate safeguarding boundaries or otherwise raises a safeguarding concern must be reported immediately to SPM's Designated Safeguarding Lead (DSL).

SPM will manage the matter in accordance with its Safeguarding and Child Protection Policy and current statutory and local safeguarding procedures. Where appropriate, advice will be sought from or a referral made to the Local Authority Designated Officer (LADO), commissioning organisation, children's social care, police or another relevant authority.

SPM will not undertake an internal conduct process in a way that could prejudice or interfere with a safeguarding, police, local authority or other external investigation.

Where necessary to protect a learner or allow a concern to be considered safely, SPM may temporarily remove a person from contact with a particular learner, pause the allocation of further work or restrict particular duties while the matter is considered. Such action is precautionary and does not in itself indicate that the concern has been substantiated.

Low-level concerns about behaviour towards children will be managed and recorded in accordance with SPM's Safeguarding and Child Protection Policy.

Continuing Suitability

SPM's responsibility for safer recruitment and safeguarding continues throughout an individual's engagement with the organisation.

If information arises that may affect a person's continuing suitability to work with children or young people, SPM will consider the information in accordance with its Safeguarding and Child Protection and Safer Recruitment Policies.

This may include information arising from safeguarding concerns, DBS or other vetting information, a commissioning organisation, another professional or organisation, or information disclosed by the individual themselves.

Appropriate advice or information may be sought from relevant safeguarding, commissioning or regulatory bodies where required.

Complaints

A complaint about the actions or behaviour of someone working on behalf of SPM will normally be considered initially under SPM's Complaints Policy and Procedure.

Where a complaint raises concerns about the conduct, professional standards, or continuing suitability of a tutor, mentor, or contractor, SPM may also take appropriate action under this policy.

Safeguarding concerns identified through a complaint will be referred immediately to the DSL and managed under the Safeguarding and Child Protection Policy.

Malpractice, Maladministration and Assessment Concerns

SPM will handle suspected malpractice or maladministration relating to qualifications, assessment, learner evidence, internal quality assurance, records, certification, or awarding organisation requirements under SPM's Malpractice and Maladministration Policy.

SPM will notify OCN London, an examination centre or another relevant awarding organisation where required and will follow any instructions provided before proceeding with an internal investigation.

Where malpractice or maladministration is substantiated, the outcome may also be considered when deciding whether an individual's engagement with SPM should continue.

Conflicts of Interest

Actual, potential or perceived conflicts of interest must be disclosed and managed in accordance with SPM's Conflict of Interest Policy.

Failure to disclose a relevant conflict, providing misleading information about a conflict or failing to comply with agreed arrangements for managing a conflict may result in action under this policy, in addition to any action required under SPM's Conflict of Interest or Malpractice and Maladministration Policies.

Whistleblowing

Anyone working on behalf of SPM is encouraged to raise genuine concerns about wrongdoing, unsafe practice or safeguarding failures in accordance with SPM's Whistleblowing Policy.

No person will be subject to action under this policy simply because they have raised a genuine concern that they reasonably believe to be true.

Knowingly making a false or malicious allegation may, however, be considered separately in accordance with the circumstances.

Possible Actions and Outcomes

The action taken will depend on the circumstances and seriousness of the concern. SPM is not required to follow each possible action in sequence where the circumstances make this inappropriate.

Possible actions may include:

- informal guidance or clarification of expectations;
- additional training, CPD or support;
- increased monitoring or review;
- requirements to correct records, practice or procedures;
- restrictions on particular duties or activities;
- reallocation or removal from a particular learner or assignment;
- temporary removal from assessment, internal quality assurance or other responsibilities;
- pausing the allocation of further work while a serious concern is considered;
- referral to a commissioning organisation, awarding organisation, examination centre, safeguarding authority, regulator, police or other relevant body; or
- ending the individual's engagement with SPM in accordance with the terms of their contractual arrangement.

A serious concern may result in an engagement being ended without previous informal action.

Repeated concerns, failure to address previously identified issues, serious breaches of the Code of Conduct or SPM policies, failure to cooperate with required safeguarding or quality assurance processes, or circumstances that call into question an individual's continuing suitability may also result in SPM ending the engagement.

Ending an Engagement

SPM may end an individual's engagement where it considers that continuing the contractual relationship is no longer appropriate.

This may include circumstances involving serious misconduct, safeguarding or suitability concerns, serious or repeated breaches of SPM policies or agreed requirements, substantiated malpractice, serious breaches of professional boundaries, dishonesty, or a breakdown in the professional relationship that means the engagement cannot reasonably continue.

Any decision will take account of the available evidence, the seriousness and circumstances of the matter, safeguarding considerations and the terms of the individual's contractual arrangement.

Where required, SPM will also consider whether information must be referred or reported to a commissioning organisation, OCN London or another awarding organisation, the LADO, Disclosure and Barring Service, police or another relevant authority.

Review of a Decision

Where SPM decides to end an individual's engagement following consideration of a conduct concern, the individual may request a review of the decision within **15 working days** of receiving the outcome.

The request should explain the grounds for review and identify any relevant information that the individual believes was not properly considered.

Where reasonably possible, the review will be considered by a person who was not responsible for the original decision. In a small organisation this may not always be practicable, and SPM may seek appropriate independent input where necessary.

The outcome of the review will be communicated to the individual and will represent SPM's final internal decision.

This review process does not replace or override any separate appeal, review or external process available under safeguarding, complaints, awarding organisation, contractual or other relevant procedures.

Confidentiality and Record Keeping

Concerns and related information will be handled sensitively and shared only with those who need the information to consider the matter, safeguard a learner, fulfil contractual or commissioning responsibilities, or meet legal, regulatory or awarding organisation requirements.

Records will be factual, proportionate and stored securely in accordance with SPM's Privacy and Data Protection Policy.

Information will be shared with safeguarding authorities, commissioning organisations, awarding organisations, regulators or other bodies where required or appropriate.

Monitoring and Review

SPM will review significant conduct concerns and outcomes to identify any recurring issues, safeguarding implications or improvements required to organisational practice.

This policy will be reviewed annually, or sooner where statutory guidance, awarding organisation requirements, contractual arrangements or SPM's operating arrangements change.