



## Malpractice and Maladministration Policy

### 1. Purpose

The purpose of this policy is to set out how TPS Tech Services Ltd prevents, identifies, investigates, and manages instances of malpractice and maladministration within its operations. The policy ensures transparency, accountability, and compliance with legal, regulatory, and professional standards.

### 2. Scope

This policy applies to:

- All consultancy, auditing, and training activities carried out by TPS Tech Services.
- All employees, associates, contractors, and partners working on behalf of TPS Tech Services.
- All documentation, reports, audits, and client-facing deliverables.

### 3. Definitions

- **Malpractice:** Any deliberate act, neglect, default, fraud, or misrepresentation that compromises integrity, client trust, regulatory compliance, or professional standards.  
Examples: falsifying audit results, misusing client data, failure to disclose conflicts of interest.
- **Maladministration:** Any unintentional failure, error, or poor practice that results in non-compliance with expected standards.  
Examples: administrative errors in reporting, failure to follow documented procedures, poor record keeping.

### 4. Policy Statement

TPS Tech Services is committed to:

- Operating with integrity, impartiality, and professionalism at all times.
- Identifying and addressing malpractice or maladministration promptly.
- Ensuring corrective and preventative actions are implemented to avoid recurrence.
- Protecting whistleblowers and maintaining confidentiality during investigations.

### 5. Use of AI

Use of AI for creation of Lerner work is strictly prohibited and if identified it will be investigated under this policy.

### 6. Preventative Measures

To minimise the risk of malpractice or maladministration, TPS Tech Services will:

- Maintain robust **document control and QA systems**.
- Ensure all consultants follow **standardised operating procedures**.
- Provide **ongoing training and CPD** to maintain competence.
- Require declarations of **conflicts of interest** before undertaking assignments.
- Implement **audit and peer-review checks** for critical deliverables.

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## 7. Identification of Malpractice or Maladministration

Potential issues may be identified through:

- Internal QA checks and management reviews.
- Client feedback or complaints.
- Whistleblowing by staff, contractors, or third parties.
- Audit findings (internal, client, or external certification bodies).

## 8. Investigation Process

When malpractice or maladministration is suspected or reported, TPS Tech Services will:

1. **Acknowledge** receipt of the concern within 5 working days.
2. **Appoint an Investigating Officer** (Director or independent senior consultant).
3. **Gather evidence**, including documentation, records, and witness statements.
4. **Assess impact and seriousness** of the allegation.
5. **Report findings** to the Director for decision-making.
6. **Take corrective action**, which may include:
  - Retraining of staff.
  - Process improvements.
  - Formal warnings or termination of contracts.
  - Notification to regulatory bodies if required.
7. **Communicate outcome** to relevant parties while maintaining confidentiality.

## 9. Confidentiality & Whistleblowing

- All investigations will be handled with discretion.
- Identities of whistleblowers will be protected unless disclosure is legally required.
- Retaliation against individuals who report malpractice or maladministration is strictly prohibited.

## 10. Record Keeping

- All cases of suspected or confirmed malpractice/maladministration will be logged.
- Records will include the allegation, investigation steps, evidence, findings, and corrective actions.
- Records will be retained for **minimum 3 years** (or longer if legally required).

## 11. Review & Continuous Improvement

- This policy will be reviewed annually or sooner if required by changes in legislation, standards, or business practice.
- Lessons learned from investigations will feed into **continuous improvement** of TPS Tech Services' quality management framework.

## 12. Responsibilities

- **Director (Tomasz Saternus)**: Overall accountability for ensuring this policy is implemented and reviewed.

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**TPS TECH SERVICES**

Food integrity in the centre of what we do

- **Investigating Officer:** Responsible for impartial investigations.
- **All Staff/Associates:** Responsible for complying with this policy and reporting concerns immediately.

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**Approved by:**

Tomasz P. Saternus

Director

TPS Tech Services

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