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Policy

Revision History

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NCC Education Whistleblowing Policy (External)

1. Introduction

1.1. Policy Statement

This document describes NCC Education's Whistleblowing Policy for individuals who are not employed by us and explains when whistleblowing may be appropriate and provides guidance for contacting NCC Education in such a situation.

NCC Education's External Whistleblowing Policy applies to:

- Candidates/students
- Teaching staff
- Centre staff including managers and administrators
- Members of the public

NCC Education employees who wish to make a whistleblowing declaration should in the first instance speak to the Quality Assurance Manager or HR Manager in confidence, or if they do not feel able to do so then they should consult the whistleblowing policy of our regulators, Ofqual, for guidance: <http://ofqual.gov.uk/complaints-and-appeals/whistleblowing/>. This link also provides a further link to essential details of the Public Interest Disclosure Act (PIDA).

Under the Public Interest Disclosure Act (PIDA), a worker who makes a protected disclosure has a right not to be subject to detriment by his or her employer because of that protected disclosure, and the worker will not breach his or her employment contract in making that protected disclosure.

It is a disciplinary matter both to victimise a genuine whistleblower, or for someone to maliciously make a false allegation.

1.2. Definitions

Whistleblowing

Whistleblowing is a term used when an individual discloses information relating to potential or actual malpractice or wrongdoing and/or the covering up of malpractice or wrongdoing.

Malpractice

Malpractice is any deliberate activity, neglect, default or other practice that compromises the integrity of the assessment process and/or the validity of certificates.

Malpractice can include criminal offences such as bribery or falsifying of assessment records (fraud). Other examples would include failing to maintain the security of an assessment (for example, by giving away exam questions or marking schemes), assisting candidates in the production of projects and assignments so that a submission is not the candidate's own work, and redacting or changing examination questions or assignment tasks, thus compromising the integrity of the assessment.

For more detailed information on Malpractice and Maladministration, please refer to NCC Education's *Malpractice and Maladministration Policy*, available on the NCC Education website.

Note: Complaints and Appeals

Whistleblowing does not apply to either making a complaint or an appeal. A complaint is an expression of personal dissatisfaction, whether justified or not. Reviews of Results and Appeals are submitted to provide an opportunity for candidates or Centres to ensure that NCC Education's marking processes and procedures have been followed correctly, and to confirm that any grade awarded is fully justified. For more information on Complaints, Reviews of Results and Appeals, please see the appropriate policy documents available on the NCC Education website.

2. Whistleblowing Procedure

2.1. How to raise a concern

Stage 1

Whatever the circumstance, where there is a concern that malpractice has taken place in relation to NCC Education qualifications, normal practice is to raise it through the line management of the organisation concerned. For a candidate, the first point of contact would be their tutor(s) or Head of Centre.

Stage 2

If your concerns are not addressed at this stage, or you feel it is not possible to raise concerns internally then you should contact and address your concerns directly to the Quality Assurance Manager at NCC Education by email at quality@nccedu.com, or through any of the other channels of communication in Section 4, below.

2.2. NCC Education Response Procedure

Stage 3

NCC Education's Quality Assurance department will evaluate your concern and may ask you for more evidence or information. The Quality Assurance Manager will decide whether and how to pursue the issue which you have raised.

If NCC Education proceeds to investigate possible malpractice based on your disclosure, the Quality Assurance Manager may inform the relevant UK regulators of the issue raised and the course of action to be taken. The regulator would then be updated regularly throughout all stages of any investigation.

The regulator would be provided with full details of the conclusion of any investigation and where any serious issues are proven, other awarding organisations offering the same or similar qualifications will also be informed.

Whistleblowers may choose to inform the regulator of the allegation themselves, though in most cases the regulator will request that NCC Education, as the awarding body, investigates the matter initially. Whistleblowers also have the option to raise their concerns with the regulator if they do not feel that they have been appropriately addressed by NCC Education.

Important Notes

- a) Once a concern has been raised, whistleblowers are asked not to regularly contact NCC Education to seek updates. NCC Education has a responsibility to all concerned with respect to confidentiality, and may not be able to divulge any additional information. All parties will be informed of the outcome of any investigation if it is possible to do so without breaching any party's right to confidentiality.
- b) At all stages of the matter being investigated, NCC Education will take all possible steps to protect the identity of the whistleblower, notwithstanding the circumstances described in the Section 3, below.
- c) NCC Education will consider each disclosure of information sensitively and carefully, and decide upon an appropriate response. Information received in a disclosure may be shared with third parties where considered necessary.

3. Confidentiality

NCC Education will always do the utmost to keep a whistleblower's identity confidential where asked to do so, although by law and by regulation, we may need to disclose their identity to:

- the police, fraud prevention agencies or other law enforcement agencies (to investigate or prevent criminal activities)
- a Court of Law (in connection with legal or criminal proceedings)
- the national regulator responsible for the standards of the qualification(s) concerned
- other person(s) or organisation(s) to whom we are required by law to disclose your identity.

A whistleblower should also be aware that he or she may be identifiable by others due to the nature or circumstances of the disclosure.

4. What information do we need?

When making a whistleblowing declaration, please provide as much of the following information as possible:

Contact Information

- Your Name
- Name of Centre/Organisation
- Your Email
- Your Phone Number

Details of Issue(s)

- Qualification(s) Affected
- Number of Learners Affected
- Summary of details
- List of evidence you have seen/witnessed, or which is in your possession

4.1. How to contact us

Whistleblowing disclosures can be made by in the following ways:

By email:	quality@nccedu.com
By post:	For the attention of the Quality Assurance Manager NCC Education The Towers Towers Business Park Wilmslow Road Didsbury Manchester M20 2EZ UK
By phone:	+44 (0)161 438 6200
By fax:	+44 (0)161 438 6240
Opening hours:	08:30 - 17:00 (GMT/BST) Mon-Fri