

# Whistle-blowing Policy (External)

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**Reference Number: AQ\_34-a04**

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## Policy

### Revision History

| Version   | Last revised   | Next review date | Policy Owner     | Notes              |
|-----------|----------------|------------------|------------------|--------------------|
| 1.0       | 25 July 2014   | 30 June 2015     | James Stephenson |                    |
| AQ_34-a01 | 10 June 2015   | 30 June 2016     | James Stephenson | Reviewed           |
| AQ_34-a02 | 4 January 2016 | 30 June 2016     | Claire Garth     | Updated            |
| AQ_34a03  | 4 January 2016 | 30 June 2016     | Claire Garth     | Reviewed           |
| AQ_34_a04 | 29 April 2019  | 30 June 2020     | Olivia Bussey    | Reviewed & Updated |
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# 1. Introduction

NCC Education is committed to the highest standard of conduct and integrity in its business activities in the UK and overseas. This requires honesty and integrity in all areas of the business and a culture of openness between all staff, third parties, customers and contractors.

NCC Education encourages those that have any concerns about any aspect of the work of NCC Education come forward and voice those concerns.

The purpose of this policy is to:

- Give information on how to identify situations that may represent wrongdoing
- Provide information on how to report allegations of wrongdoing
- Give reassurance to those reporting concerns of wrongdoing that they are protected from adverse consequences

This policy therefore, applies to individuals who are not employed by NCC Education and wish to make a disclosure to NCC Education in relation to the following:

- The development, delivery and award of NCC Education's qualifications and programmes
- Malpractice, Maladministration or failure to comply with regulations. Please also refer to our Malpractice and Maladministration Policy.

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: <https://www.gov.uk/guidance/ofquals-whistleblowing-policy>.

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.

## 1.2 Definitions

**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** 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.

## 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](mailto: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

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 or 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](mailto: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