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Whistleblowing Policy (Exams) 2025-2026

Blue Coat CE Secondary School

Policy Date: September 2025

Review Date: September 2026

Document History

Version	Status		Date	Author	Summary Changes
V1			September 2023	Kelly Jobson	Updated to Reflect JCQ changes 2023-2024
V2			September 2024	Kelly Jobson	No Changes made
V3			September 2025	Kelly Jobson	Updated to reflect JCQ changes summary at the bottom of the document

1. Introduction

Whistleblowing at Blue Coat School is encouraged, not penalised, and staff are made aware that they have a duty to report any concerns they have about the conduct of examinations.

The Head of Centre and governing board at Blue Coat School aim to create and maintain an approach to examinations that reflects an ethical culture and encourages staff and students to be aware of and report practices that could compromise the integrity and security of examinations. In compliance with section 5.11 of the JCQ's General Regulations for Approved Centres, Blue Coat School will:

- Take all reasonable steps to prevent the occurrence of any malpractice (which includes maladministration) before, during and after assessments have taken place.
- Inform the awarding body immediately of any alleged, suspected or actual incidents of malpractice or maladministration, involving a candidate or a member of staff, by completing the appropriate documentation.
- As required by an awarding body, gather evidence of any instances of alleged or suspected malpractice (which includes maladministration) in accordance with the JCQ publication Suspected Malpractice: Policies and Procedures and provide such information and advice as the awarding body may reasonably require.
- This policy requirement was added within General Regulations for Approved Centres in response to the recommendations within the report of the Independent Commission on Examination Malpractice.
- This policy sets out the whistleblowing procedures at Blue Coat School. It has been produced and reviewed by Lisa Henden, Associate Headteacher and member of the senior leadership team, who is responsible for handling any cases of whistleblowing. She is fully aware of the contents of this policy and will escalate any instances of malpractice to the relevant awarding body/bodies.

This policy also sets out the principles which allow members of centre staff and students to feel confident in reporting instances of actual, alleged or suspected malpractice to relevant members of senior leadership.

2. Purpose of the Policy

This policy:

- Encourages individuals to raise concerns, which will be fully investigated by appropriately trained and experienced individuals.
- Identifies how to report concerns.
- Explains how such concerns will be investigated and sets expectations regarding the reporting of outcomes.
- Provides details of relevant bodies to whom concerns about wrongdoing can be reported, including awarding organisations and regulators.
- Includes a commitment to do everything reasonable to protect the reporter's identity, if requested.
- Sets out how those raising concerns will be supported.

This policy also details the steps that could be taken by an individual involved in the management, administration and/or conducting of examinations if Blue Coat School fails to comply with its obligation to report any alleged, suspected or actual incidents of malpractice or maladministration.

3. The Whistle-Blower

A whistle-blower is defined as a person who reports an actual or potential wrongdoing and is protected by the Public Interest Disclosure Act 1998, providing they are acting in the public interest.

If the person raising the issue is a worker, this will be considered as whistleblowing. This includes agency staff and contractors.

4. Reporting

If a member of centre staff involved in the management, administration and/or conducting of examinations (such as exams officer, exams assistant or invigilator), a student or a member of the public (such as a parent/carer) has a concern or reason to believe that malpractice has or will occur in an examination or assessment, concerns should normally be raised initially with Lisa Henden, Headteacher.

However, there may be times when it may be more appropriate to refer the issue directly to the governing board, most often when the allegation is against the Head of Centre.

5. Examples of Malpractice

In addition to the centre-wide Whistleblowing Policy, this exams-specific policy includes reference to exams-related breaches including, but not limited to, the following:

- Failure to comply with exam regulations as set out by the Joint Council for Qualifications (JCQ) and its awarding bodies.
- A security breach of the examination paper.
- Conduct of centre staff which undermines the integrity of the examination.
- Unfair treatment of candidates by either giving an advantage to a candidate/group of candidates (e.g. by permitting a candidate an access arrangement which is not supported by appropriate evidence), or disadvantaging candidates by not providing access to the appropriate conditions (providing a 'level playing field').
- Possible fraud and corruption (e.g. accessing the exam paper prior to the exam to aid teaching and learning).
- Abuse of authority (e.g. the Head of Centre/members of the senior leadership team overriding JCQ and awarding body regulations).
- Misuse of artificial intelligence or plagiarism by candidates or staff.
- Other conduct which may be interpreted as malpractice/maladministration.

6. Whistleblowing Procedure

If the individual does not feel safe raising the issue/reporting malpractice within the centre, or they have done so and are concerned that no action has been taken, that individual could consider making their disclosure to a malpractice expert at the awarding body for the qualification where malpractice is suspected.

For members of centre staff, it is likely that the Public Interest Disclosure Act (PIDA) offers legal protection from being dismissed or penalised for raising certain serious concerns ('blowing the whistle'). Whistleblowing rights under PIDA are day one rights. This means that the worker does not need the same two years' service that is needed for other employment rights.

To investigate concerns effectively, the awarding body should be provided with as much relevant information as possible, which may include:

- The qualifications and subjects involved.
- The centre involved.
- The names of staff/candidates involved.
- The regulations breached/specific nature of suspected malpractice.
- When and where the suspected malpractice occurred.
- Whether multiple examination series are affected.
- If the issue has been reported to the centre and what the outcome was.
- How the issue became apparent.

Members of the public are not protected by PIDA, but the awarding body will make every effort to protect their identity if that is what they wish, unless the awarding body is legally obliged to release it.

Alternatively, a worker could consider making a disclosure to Ofqual as a prescribed body for whistleblowing to raise a concern about wrongdoing, risk or malpractice.

7. Anonymity

In some circumstances, the whistle-blower might find it difficult to raise concerns with the nominated member of the senior leadership team. If a concern is raised anonymously, the issue may not be able to be taken further if insufficient information has been provided. In such instances, and if appropriate, the allegation may be disclosed to a union representative, who could then be required to report the concern without disclosing its source.

Alternatively, whistle-blowers or others with concerns about potential malpractice can report the matter directly to Ofqual, who is identified as a 'prescribed body'. Awarding organisations are not prescribed bodies under whistleblowing legislation; however, awarding organisation investigation teams do give those reporting concerns the opportunity for anonymity.

A whistle-blower can give their name but may also request confidentiality; the person receiving the information should make every effort to protect the identity of the whistle-blower.

8. JCQ Regulatory Updates 2025/2026

In accordance with the latest guidance from the Joint Council for Qualifications (JCQ), Blue Coat School has updated this policy to reflect the following regulatory changes:

- Cyber Security Training: All staff accessing awarding bodies' systems must complete annual cyber security training. Certificates must be retained for inspection, and the centre must maintain a robust cyber security policy.

- Continuing Professional Development (CPD): The Head of Centre must ensure that the Exams Officer, SENCo, and Access Arrangements Assessor undertake regular CPD, including annual update training.
- Succession Planning: The centre's contingency planning must include succession arrangements for key examination roles to ensure continuity and compliance.
- AI Misuse and Plagiarism: Malpractice now includes misuse of artificial intelligence and plagiarism. Candidates must be clearly informed of these risks and how to avoid them.
- Annual Policy Review: All written policies required for inspection must be reviewed annually by a member of the senior leadership team and communicated to relevant staff.
- Expanded Qualification Coverage: JCQ regulations now apply to additional qualifications including Cambridge Advanced Nationals, NCFE Vocational and Technical qualifications, and TQUK qualifications.

9. Instructions for Conducting Examinations – Malpractice in the Exam Room

This Whistleblowing Policy outlines the procedures and principles for reporting concerns related to examinations at Blue Coat School. It reflects the centre's commitment to maintaining the integrity and security of all assessments and incorporates the latest JCQ regulatory updates for 2025/2026. Staff, students, and members of the public are encouraged to report any concerns, and the centre will take all reasonable steps to investigate and respond appropriately, ensuring full compliance with JCQ requirements.

Reviewed by:

Kelly Jobson

September 2025

Next Review Date:

September 2026

Approved by Directors:

1 December 2025

Signed:



Lois Whitehouse
CEO



Nicky Aston
Chair of Standards