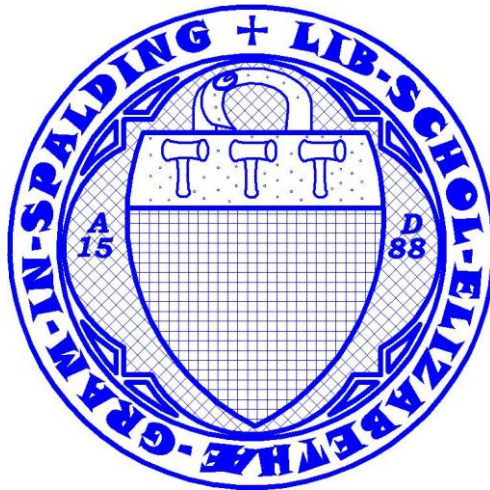


Spalding Grammar School



Whistleblowing Policy (Examinations)

Author:	Mrs N Franklin – Examinations Officer
Approved by:	Mrs E Davison - Assistant Headteacher i/c Assessment, Data and Examinations
Review Cycle:	Annually
Date of Policy:	January 2026
Next Review Date:	December 2026

Key staff involved in the Policy/Procedure:

Role	Name(s)
Centre Number	26233
Head of Centre	Mrs M K Anderson
Assistant Headteacher i/c Assessment, Data and Examinations	Emma Davison
Examinations Officer	Nicola Franklin
SENDCo	Amanda Johnson
Senior Leader(s)	Suzanne Ingram Anthony Brooks Emma Davison Gareth Baker Alison Harrison Wild

This policy is specific for whistleblowing relating to internal and external examinations and assessments and is reviewed and updated annually to ensure Spalding Grammar School meet any changes in the General Regulations. Please refer to the more detailed school Whistleblowing Policy if in regard of other areas of school.

As a Lincolnshire School, Spalding Grammar School adhere to the Lincolnshire County Council Whistleblowing Policy ([Whistleblowing policy – Protected disclosures and confidentiality - Lincolnshire County Council](#)).

References in this policy to GR and ICE refer to:

- JCQ documents General Regulations for Approved Centres 2025-26
- Instructions for Conducting Examinations. 2025-26
- Spalding Grammar School Whistleblowing Policy 2025-26

Introduction

Whistleblowing at Spalding Grammar 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 and assessments. Please refer to the Spalding Grammar School full Whistleblowing Policy for more information regarding the School's whistleblowing policy and procedures.

The Head of Centre and Governing Board at Spalding Grammar School aim to create and maintain an approach to examinations and assessments that reflects an ethical culture and encourages staff and pupils to be aware of and report practices that could compromise the integrity and security of examinations and assessments.

In compliance with section 5.11 of the JCQ's GR Spalding Grammar 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 document **Suspected Malpractice: Policies and Procedures 2025-26** and provide such information and advice as the awarding body may reasonably require.

This policy requirement was added in response to the recommendations within the report of the *Independent Commission on Examination Malpractice*¹.

This policy also sets out the principles and whistleblowing procedures, relating to internal and external examinations/assessments which allow members of Spalding Grammar School staff and pupils to feel confident in reporting instances of actual, alleged or suspected malpractice to the Assistant Headteacher i/c Assessment, Data and Examinations or, in their absence, members of the Senior Leadership Team who will escalate any instances of maladministration or malpractice through the Head of Centre to the relevant awarding body/bodies.

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 and assessments if Spalding Grammar School fails to comply with its obligation to report any alleged, suspected or actual incidents of malpractice or maladministration.

The Whistleblower

A whistleblower 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.

Reporting

If a member of centre staff involved in the management, administration and/or conducting of internal or external examinations and assessments (such as the Examinations Officer, Examinations Assistant or an invigilator), a pupil 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 the Assistant Headteacher i/c Assessment, Data and Examinations or directly with the Head of Centre.

However, there may be times when it may be more appropriate to refer the issue direct to the Governing Board, most often when the allegation is against the Head of Centre.

Examples of Malpractice

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

- Failure to comply with examination 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/assessment
- 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 examination paper prior to the examination 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)
- Other conduct which may be interpreted as malpractice/maladministration

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 disclosure² 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)³ offers you legal protection from being dismissed or penalised for raising certain serious concerns ('blowing the whistle'). Whistleblowing rights under PIDA are day one rights⁴. 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 information as possible/is relevant, which may include:

- The qualifications and subjects involved
- The centre involved

² Reference www.jcq.org.uk/exams-office/malpractice/public-interest-disclosure-act/

³ Reference <https://protect-advice.org.uk/pida/>

⁴ Reference <https://protect-advice.org.uk/pida/>

- 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, an employee could consider making a disclosure to Ofqual as a prescribed body for whistleblowing to raise a concern about serious wrongdoing, risk or malpractice in the centre.

Examinations Officer Professional Standards

If an Examinations Officer is completing the Examinations Officer Professional Standards (see the National Association of Examinations Officers website for more information) as part of their annual professional development, they will be required to sign a values and attributes statement.

By signing this statement, the Examinations Officer and their Senior Leadership Team/Line Manager, are identifying a set of common values and attributes. These include support for an Examinations Officer when they are faced with a situation where they may be compromised by, or put under pressure to accept, a centre decision which may not align with JCQ and awarding organisation regulations (for example, being asked not to report an instance of suspected/actual malpractice). In such circumstances, the Examinations Officer must act in line with the procedures set out in this policy.

Anonymity

In some circumstances, the whistleblower 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, whistleblowers or others with concerns about potential malpractice can report the matter direct 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 whistleblower can give their name but may also request confidentiality; the person receiving the information should make every effort to protect the identity of the whistleblower.

Pupils

Pupils at Spalding Grammar School are encouraged to feel comfortable discussing/reporting malpractice issues of which they are aware. The regulations surrounding their assessments, and wider academic integrity, will be reiterated to pupils who are undertaking, or who are about to undertake, their courses of study.