

NCUK



**Whistleblowing Policy**



**Amendment History**

<b>Release Date</b>	<b>Version No.</b>	<b>Summary of Main Changes</b>	<b>Author</b>
October 2020	V1.1	NCUK address and telephone number updated (p.7)	Quality Assurance Manager
March 2019	V1	New Policy	Quality Assurance Manager

**Review Arrangements**

This document will be reviewed annually as part of the NCUK self-evaluation arrangements. It may also be revised as and when necessary in response to feedback, trends from our internal monitoring arrangements, changes in our practices, actions from the regulatory authorities (where applicable) or external agencies or changes in legislation.

If you would like to feedback your views, please contact [quality@ncuk.ac.uk](mailto:quality@ncuk.ac.uk).

**Glossary**

The NCUK Academic Handbook includes a glossary to explain words and terms that are used by NCUK, but which may be unfamiliar to those working with us.

## Contents

<b>1. Introduction</b>	<b>4</b>
<b>2. Definitions</b>	<b>4</b>
<b>3. Whistleblowing Procedure</b>	<b>5</b>
3.1 How to raise a concern .....	5
3.2 NCUK response procedure .....	5
<b>4. Confidentiality</b>	<b>6</b>
<b>5. What information does NCUK need?</b>	<b>7</b>
<b>6. How to contact NCUK</b>	<b>7</b>

## 1. Introduction

NCUK is committed to protecting the integrity of our programmes and qualifications and ensuring valid and reliable outcomes assessment for all students. This document describes NCUK's Whistleblowing Policy for individuals who are not employed by us. It explains what whistleblowing is and when it may be appropriate, along with how to contact NCUK in such a situation.

This Whistleblowing Policy applies to:

- Students and parents
- Delivery partner staff, including centre teachers, managers and administrators
- Contractors (including Academic Consultants)
- University partner staff
- Members of the public

NCUK employees who wish to make a whistleblowing declaration should refer to the internal NCUK Whistleblowing Policy (available on PeopleHR).

## 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

Any activity, deliberate action, neglect, default or other practice which contravenes and compromises or could compromise the:

- assessment process
- integrity of a programme and/or qualification
- validity of a result or certificate
- reputation or credibility of NCUK

Malpractice can include criminal offences such as bribery or falsifying of assessment records (fraud). Other examples would include failure to maintain the security of assessments (for example, by giving away questions or marking schemes), and improper assistance to a student in the production of assessment, so that the submission is not the student's own work.

In addition, the NCUK Academic Handbook, *Malpractice and Maladministration Policy* applies to NCUK Study Centres.

- The *Malpractice and Maladministration Policy* is available to Study Centres in the Welcome Document Library.
- It is the duty of each Study Centre and its members of staff to report all suspected instances of malpractice and maladministration to NCUK. Failure to do so is, in itself, malpractice.

### Important note

Whistleblowing does not apply to either making a complaint or an appeal. A **complaint** is an expression of personal dissatisfaction, whether justified or not. For the NCUK Complaints and Compliments Policy, please refer to the [NCUK website](#).

Commented [JS1]: Link to be inserted?

Students and Study Centres have the opportunity to submit **Enquiries about Results** and **Appeals** to ensure that NCUK's awarding processes and procedures have been followed correctly and that any decision is fully justified.

- If a student wishes to submit an Enquiry about Results s/he should speak to his/her Study Centre for guidance. All Enquiry about Results must be submitted via the Study Centre.
- To submit an Enquiry about Results or Appeal the Study Centre will follow the NCUK Academic Handbook, *Enquiries about Results and Appeals Policy* (which is available to Study Centres in the Welcome Document Library).

## 3. Whistleblowing Procedure

### 3.1 How to raise a concern

#### Stage 1

Whatever the circumstance, where there is a concern that malpractice or wrongdoing has taken place in relation to NCUK programmes and qualifications, normal practice is to raise it through the line management of the organisation concerned. For a student, the first point of contact would be their teacher(s) or the centre's Academic Manager.

#### Stage 2

If your concerns are not addressed at Stage 1, or you feel it is not possible to raise concerns internally with the organisation concerned, then you should contact and address your concerns directly to NCUK's Quality Assurance Manager by email at [quality@ncuk.ac.uk](mailto:quality@ncuk.ac.uk) or through any of the other channels of communication stated in Section 6 of this policy.

Depending on the seriousness and sensitivity of the issues involved and who is suspected of the wrongdoing, the NCUK Quality Assurance Manager may escalate your concern to NCUK's Academic Director. You will be advised of any escalation and the outcome by the Quality Assurance Manager

#### Stage 3

In extreme circumstances you may report your concern to NCUK's Chief Executive Officer (CEO). This can be done in writing to the address stated in Section 6 of this policy and marked private and confidential for the attention of NCUK's CEO. Depending on the nature of your concern, the CEO may raise it with NCUK's Board of Directors.

### 3.2 NCUK's investigation process and outcomes

After your communication has been received NCUK will determine the scope of the investigation that is appropriate to examine the whistleblowing concern. You may be required to attend a meeting or provide further information.

We will appoint a suitable investigator, this may be the Quality Assurance Manager or someone with relevant experience or knowledge and understanding of the subject matter of the concern.

NCUK will endeavour to keep you informed of the progress of the investigation, you must treat any information about the investigation as confidential. In some cases, the need for confidentiality will prevent us from giving you specific details of the investigation, outcome or any action take as a result of your whistleblowing concern.

### **3.3 External Disclosures**

We encourage you to use this policy whenever you have a whistleblowing concern. In most cases it should not be necessary to disclose your concerns externally.

#### **Important notes**

- a. Once a concern has been raised, whistleblowers are asked not to regularly contact NCUK to seek updates. NCUK 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<sup>1</sup> 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, NCUK will take all possible steps to protect the identity of the whistleblower, notwithstanding the circumstances described in Section 4 of this policy.
- c. NCUK will consider each disclosure of information sensitively and carefully to decide upon an appropriate response. Information received in a disclosure may be shared with third parties where considered necessary.

## **4. Confidentiality**

NCUK will always do the utmost to keep a whistleblower's identity confidential where asked to do so, although by law 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 any legal or criminal proceedings)
- Other person(s) or organisation(s) to who we are required by law to disclose you identify.

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

---

<sup>1</sup> Parties will be informed in writing (email or letter).

## 5. What information does NCUK need?

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

### Contact Information

- Your name
- Name of Study Centre/Delivery Partner
- Your email
- Your phone number

### Details of Issue(s)

- Programme(s) affected
- Number of students affected
- Summary of the details
- List of evidence you have seen/witnessed, or which is in your possession

## 6. How to contact NCUK

Whistleblowing disclosures can be made in the following ways:

By email: [quality@ncuk.ac.uk](mailto:quality@ncuk.ac.uk)

By post: FAO: Quality Assurance Manager  
NCUK  
76 King Street  
Manchester  
M2 4NH

By phone: 0161 5499 267

Opening hours Monday to Friday, 08:00 – 17:00 (GMT/BST)