

# Whistleblowing Policy

## 1. Introduction to GA

Gatehouse Awards Limited ('GA') is an Awarding Organisation recognised by Ofqual to offer regulated qualifications in range of academic and vocational subject areas.

## 2. Purpose of this Policy

This policy applies to all staff directly employed by GA, as well as any GA Centres, representatives and partners.

The aim of this policy is to set out how individuals connected with GA can raise concerns about wrongdoing that is in the public interest in a way that is safe, confidential and supportive. This policy aligns with the Employment Rights Act 1996 and the Public Interest Disclosure Act 1998 (PIDA) which protect workers who make protected disclosures and reflects the regulatory expectations placed on awarding organisations, including the need to protect the integrity of qualifications and assessments.

GA is committed to the highest standards of ethics, governance and regulatory compliance. We encourage anyone with genuine concerns to raise them at the earliest opportunity.

Please note that this does not include complaints regarding service levels, which will be handled under the GA Comments, Compliments and Complaints Policy. Similarly, any issues raised by anonymous sources which cannot be verified as coming from a relevant stakeholder, as outlined in Section 3 below, will also not be covered by this policy.

## 3. Scope of this Policy

This policy applies to all individuals who work with or on behalf of the awarding organisation in relation to the design, development, delivery or award of GA qualifications, including:

- Employees
- Contractors, consultants, and agency workers
- Examiners, assessors, moderators, quality assurers, and other associates
- Board members and committee members
- Centre staff and centre representatives
- GA representatives and the staff of those representatives
- Volunteers and temporary workers

Concerns may relate to conduct within GA, our representatives or within approved centres delivering our qualifications.

## 4. What is Whistleblowing?

Whistleblowing is disclosure of information that an individual reasonably believes is in the public interest and relates to wrongdoing. This includes, but is not limited to:

- Criminal offences
- Breaches of legal or regulatory duties
- Malpractice or maladministration in the delivery or award of qualifications
- Risks to the integrity, validity, or reliability of assessments
- Health and safety risks
- Financial mismanagement, fraud, or corruption
- Environmental damage
- Deliberate concealment of any wrongdoing

Whistleblowing is not the same as raising a personal grievance or complaint about employment or centre-related issues. Those matters should be addressed through the relevant complaints or HR procedures.

## **5. Whistleblowing in GA Representatives and Centres**

GA Representatives and approved centres and their staff play a critical role in maintaining qualification integrity. This policy applies to:

### **5.1 GA Representatives**

- Owners, directors and senior managers
- Administration staff
- Examiners
- Quality assurance staff, including moderators and external quality assurers
- Invigilators and interlocutors
- Contractors and volunteers

### **5.2 Approved Centres**

- Centre managers and senior leaders
- Tutors, assessors, internal quality assurers
- Exams officers and administrative staff
- Centre contractors or representatives

### **5.3 Relevant Concerns**

Concerns raised by the above may relate to:

- Assessment malpractice or maladministration
- Improper conduct by representative or centre staff

- Failure to follow GA policies
- Attempts to influence assessment outcomes
- Misuse of confidential assessment materials

Centres and representatives must ensure that this policy is communicated to all relevant staff and that individuals feel able to raise concerns without fear.

## **6. GA's Commitment to Non-Victimisation**

GA is committed to ensuring that all protected individuals under this policy are provided with a safe reporting environment.

Individuals who report genuine concerns under this policy will be protected from any form of victimisation. We will not tolerate any form of retaliation for such a report, including harassment, intimidation, unfair treatment, loss of work or opportunities or anything that may have a negative impact on centre approval or relationships.

Any individual or, in the case of our centres or representatives, any group of directors, owners or senior management, that is found to have victimised a whistleblower may face disciplinary action up to and including termination of contract or centre approval.

Raising a concern in good faith is protected even if it later proves to be mistaken.

## **7. Confidentiality and anonymity**

GA will always endeavour to keep a whistleblower's identity confidential where asked to do so, although in certain circumstances the whistle-blower's identity might need to be disclosed to:

- The police, fraud prevention agencies or other law enforcement agencies (to investigate or prevent crime, including fraud)
- The courts (in connection with court proceedings)
- The Regulator, such as Ofqual (in relation to any disclosures which indicate an adverse effect to GA' regulated qualifications, reputation or learners)
- Another person to whom we are required by law to make such disclosure

A whistleblower should also recognise that he or she may be identifiable to others due to the nature or circumstances of the disclosure. However, GA will take all reasonable steps to protect the identity of whistleblowers.

Concerns may be raised anonymously, but this may limit our ability to investigate, particularly if we cannot confirm that the concern has been raised by a protected individual.

## **8. Raising a concern**

Individuals can raise concerns in writing (email, post or other written medium, such as via a direct messaging app, if available). Concerns would normally be raised with a line manager, but where that is not appropriate, they can be raised directly with GA at [compliance@gatehouseawards.org](mailto:compliance@gatehouseawards.org) or to the Non-Executive Director responsible for Compliance, Jane Robson, who can be contacted via [janerobson@gatehouseawards.org](mailto:janerobson@gatehouseawards.org).

When raising a concern, the individual should provide as much details as possible, including clear information about what happened, when and where it happened and who was involved. Where they have any evidence, or believe that such evidence may be available, they should provide that evidence or give a clear indication how such evidence can be obtained.

If the concern has also been raised elsewhere, particularly if it had previously been raised with a line manager or other individual but had not been acted on, the whistleblower should inform us of that.

**NOTE:** No format for written concerns has been given to avoid unintentionally directing the style and content of such submissions. It is for the individual to decide the format and content of their submission. The individual may use the services of their trade union representative to assist them through the process (if applicable).

## **9. Getting Advice on How Best to Proceed**

If an individual would like further advice on the best way to proceed, they should consider doing the following:

- Contact Public Concern at Work on 0207 404 6609 or by email at [helpline@pcaw.co.uk](mailto:helpline@pcaw.co.uk). Further information is available at Public Concern at Work's website ([www.pcaw.co.uk](http://www.pcaw.co.uk)).
- Approach the union or professional body
- Get independent legal advice

## **10. How GA Will Handle Your Concern**

GA will take the following steps once a concern has been received:

- i. Acknowledge receipt – we will endeavour to acknowledge receipt within 5 working days. All concerns will be acknowledged, unless received anonymously where we have no contact details.
- ii. Decide on any initial response – depending on the concern raised we may have to take some immediate action to prevent further adverse effects, particularly where the allegation concerns the integrity of the qualification or assessment.
- iii. Commence a formal investigation – where appropriate, a formal investigation may have to be conducted, which will require the appointment of an appropriate independent investigator.
- iv. Provide updates during the investigation, as appropriate – this is to ensure that the whistleblower is assured that their report is being taken seriously and actions are being taken to address their concerns.
- v. Provide feedback on the outcome – bearing in mind that this may be limited depending on restrictions due to confidentiality and data protection.

The person receiving the concern is not required to adjudicate the matter in any way whatsoever. They are required to act in a professional manner and:

- remember there are two sides to every concern
- listen carefully to the concern, taking full notes as appropriate

- request and heed legitimate concerns about the employee's own safety or career
- advise the employee that the matter will be treated seriously, that it will be forwarded for investigation and that the outcome will be reported back to them as soon as possible after the investigation has been completed.

The person receiving the concern must forward it to the designated investigating officer as soon as possible, preferably within 24 hours, and is responsible for ensuring strict confidentiality is maintained on the subject. Any breaches of confidentiality will be treated as a serious disciplinary matter if the person formulating the concern is found to have been responsible for such a breach.

## **11. Investigation of a Concern of Malpractice or Wrongdoing**

Upon receipt of a concern the investigator is required to:

- ascertain whether the matter is something that can be dealt with internally and/or
- whether it is a criminal matter that should be investigated by the police
- inform the Governance Committee of the report and agree an action plan to properly investigate the matter, including any possible suspension of person(s) whilst the investigation is taking place
- ensure all meetings concerning the allegations are minuted and statements from persons assisting with the investigation are correctly documented, signed and dated
- ensure that, at the conclusion of the investigation, the evidence is reviewed by the Governance Committee to consider whether the allegation was substantiated or otherwise. The outcome of the investigation should be notified to the person(s) under investigation and the individual who raised the concern before the outcome is brought into the public domain.

## **12. Access to External Bodies**

If GA decides that the allegation is unsubstantiated, or the individual is unsatisfied with the outcome of the investigation, they have the right to access an appropriate official external body.

An appropriate outside body to consult may be:

- Ofqual
- Public Concern at Work
- An MP or local councillor
- A trade union or professional association

Individuals are reminded that they have no right of access to external bodies until the internal procedures have been fully exhausted.

Document Specification:	
Purpose:	This policy sets out how an individual might raise an issue in good faith without fear of reprisal and how GA will investigate and deal with such issues.
Accountability:	GA Governing Body
Responsibility:	Director
Version:	6
Effective from:	April 2026
Indicative Review date:	April 2028
Links to Ofqual GCR	A7 and A8.2
Other relevant documents:	Malpractice and Maladministration Policy & Procedure Comments, Compliments and Complaints Policy & Procedure Centre Handbook