



## The PGS Anti-Malpractice and Whistleblowing (Exams) Policy

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## The PGS Anti-Malpractice and Whistleblowing (Exams) Policy

### 1. Introduction

- 1.1. This policy, The PGS Anti-Malpractice and Whistleblowing (Exams) Policy, has a specific focus on public examinations and is a requirement of the Joint Council for Qualifications (JCQ). It is additional to The PGS Whistleblowing Policy and should be read in conjunction with it
- 1.2. This policy gives information in relation to avoiding malpractice, escalating concerns relating to malpractice and reporting malpractice, both internally and to the relevant examination board
- 1.3. Whistleblowing at The Portsmouth Grammar School (the 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 and other concerns more generally.
- 1.4. The Head of Centre and the Governing Body at the School aim to create and maintain an approach to examinations that reflects an ethical culture, and which encourages staff and pupils to be aware of and report practices that could compromise the integrity and security of examinations and assessments.
- 1.5. In compliance with section 5.11 of the JCQ's [General Regulations for Approved Centres](#),<sup>1</sup> the School will:
  - 1.5.1 take all reasonable steps to prevent the occurrence of any malpractice (which includes maladministration) before, during and after assessments have taken place
  - 1.5.2 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
  - 1.5.3 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](#)<sup>2</sup> and provide such information and advice as the awarding body may reasonably require
- 1.6. 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*<sup>3</sup>.
- 1.7. This policy has been produced and reviewed by the Deputy Head Academic & Staff Welfare (DHA) who is also a member of the Senior Management Team and responsible for handling any cases of whistleblowing. The DHA is fully aware of the contents of this policy and will escalate any instances of malpractice to the relevant awarding body/bodies. Details of the DHA and other key personnel involved in the formulation and administration of this policy can be found in paragraph 3.
- 1.8. This policy also sets out the principles which allow members of centre staff and pupils to feel confident in escalating and/or reporting instances of actual, alleged or suspected malpractice to relevant members of the Senior Management Team and/or Governors and/or the relevant examination board.

<sup>1</sup> Reference [www.jcq.org.uk/exams-office/general-regulations/](http://www.jcq.org.uk/exams-office/general-regulations/)

<sup>2</sup> Reference [www.jcq.org.uk/exams-office/malpractice/](http://www.jcq.org.uk/exams-office/malpractice/)

<sup>3</sup> Reference [www.jcq.org.uk/examination-system/imc-home/](http://www.jcq.org.uk/examination-system/imc-home/)

## 2. Purpose of the policy

This policy:

- 2.1. encourages individuals to raise concerns, which will be fully investigated by appropriately trained and experienced individuals;
- 2.2. identifies how to report concerns;
- 2.3. explains how such concerns will be investigated and sets expectations regarding the reporting of outcomes;
- 2.4. provides details of relevant bodies to whom concerns about wrongdoing can be reported, including awarding organisations and regulators;
- 2.5. includes a commitment to do everything reasonable to protect the reporter's identity, if requested;
- 2.6. sets out how those raising concerns will be supported;
- 2.7. details the steps that could be taken by an individual involved in the management, administration and/or conduct of examinations and assessments if the School fails to comply with its obligation to report any alleged, suspected or actual incidents of malpractice or maladministration.

## 3. Key staff involved in the formulation and administration of this policy/procedure

Role	Name
Head of Centre (HoC)	David Wickes
Deputy Head (Academic & Staff Welfare) (DHA)	Samantha Haslam
Head of Examinations (HoE)	Debby Valentine
Deputy Head of Examinations (DHoE)	Jannick O'Meara
See also Section 12 below	

## 4. Whistleblower - definition

- 4.1. 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.
- 4.2. If the person raising the issue is a worker, this will be considered as whistleblowing. This includes agency staff, contractors and invigilators.

## 5. Escalating and/or reporting possible malpractice or concerns

- 5.1. If a member of centre staff involved in the management, administration and/or conducting of examinations and assessments (such as the HoE, DHoE or an invigilator), a pupil or a member of the public (such as a parent/carers) 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 School's DHA and/or the Head.
- 5.2. However, there may be times when it may be more appropriate to refer the issue direct to the governing body, most often if the allegation is against member(s) of the School's Senior Management Team.

- 5.3. As detailed in paragraph 1.5 above, in certain circumstances it will be necessary to inform the awarding body of any alleged, suspected or actual incidents of malpractice or maladministration, and for the School to comply with the awarding body's reasonable subsequent requirements.
- 5.4. Colleagues raising concerns should be aware that investigations and the outcomes of such investigations are confidential between the School and the relevant Awarding Body and so they may not receive detailed information about the eventual outcome. However, in all cases, colleagues will receive appropriate support and updates from the Deputy Head (Academic and Staff Welfare) or for the HoC or Governing Body if the report concerns the DHA or HoC.

## 6. Examples of malpractice

- 6.1. In addition to the PGS Whistleblowing Policy, the scope of this examination-specific policy includes, but is not limited to, exam-related malpractice or breaches such as the following:
  - 6.1.1 Failure to comply with examination regulations as set out by the Joint Council for Qualifications (JCQ) and its awarding bodies;
  - 6.1.2 A security breach of the examination paper;
  - 6.1.3 Conduct of centre staff which undermines the integrity of the examination/assessment;
  - 6.1.4 Unfair treatment of candidates by either giving an advantage to a candidate/group of candidates (for example, 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');
  - 6.1.5 Possible fraud and corruption (for example, accessing the exam paper prior to the exam to aid teaching and learning);
  - 6.1.6 Inappropriate use of technology, including the use of Artificial Intelligence (see for example the JCQ publication [AI Use in Assessments: Protecting the Integrity of Qualifications \(updated 30-4-25\)](#), a guide for teachers and assessors, this gives additional information about AI misuse, the risks of using this and how it will be treated as malpractice));
  - 6.1.7 Abuse of authority (for example, the Head of Centre/members of the Senior Management Team overriding JCQ and awarding body regulations); or
  - 6.1.8 Other conduct which may be interpreted as malpractice/maladministration.

## 7. Whistleblowing procedure

- 7.1. In the first instance, if reporting possible malpractice or concerns, an individual will usually follow the procedure detailed in paragraph 5 above (Escalating and/or reporting possible malpractice or concerns)
- 7.2. If, however, 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<sup>4</sup>.

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<sup>4</sup> Reference [www.jcq.org.uk/exams-office/malpractice/public-interest-disclosure-act/](http://www.jcq.org.uk/exams-office/malpractice/public-interest-disclosure-act/)

- 7.3. 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')<sup>5</sup>. Whistleblowing rights under PIDA are day one rights<sup>6</sup>. This means that the worker does not need the same two years' service that is needed for other employment rights.
- 7.4. In order to investigate concerns effectively, the awarding body should be provided with as much relevant information as possible which may include:
- 7.4.1 The qualification(s) and subject(s) involved;
  - 7.4.2 The centre involved;
  - 7.4.3 The names of staff and/or candidates involved;
  - 7.4.4 The regulations breached and/or specific nature of suspected malpractice;
  - 7.4.5 When and where the suspected malpractice occurred;
  - 7.4.6 Whether multiple examination series are affected;
  - 7.4.7 Whether the suspected malpractice has been reported to the centre and what the outcome was; and
  - 7.4.8 How the suspected malpractice became apparent.
- 7.5. 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.<sup>7</sup>
- 7.6. Alternatively, a worker could consider making a disclosure to Ofqual<sup>8</sup> as a prescribed body for whistleblowing to raise a concern about wrongdoing, risk or malpractice.

## 8. The Head of Examinations Professional Standards

- 8.1. The Head of Examinations and the Senior Management Team share a set of common values and attributes. These include support for the HoE 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 HoE must act in line with the procedures set out in this policy.

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<sup>5</sup> Reference **Public Interest Disclosure Act 1998** [www.legislation.gov.uk/ukpga/1998/23/contents](http://www.legislation.gov.uk/ukpga/1998/23/contents)

<sup>6</sup> Reference <https://protect-advice.org.uk/pida/>

<sup>7</sup> Reference [www.ocr.org.uk/administration/general-qualifications/assessment/malpractice/whistleblowing/](http://www.ocr.org.uk/administration/general-qualifications/assessment/malpractice/whistleblowing/)

<sup>8</sup> Reference [www.gov.uk/guidance/ofquals-whistleblowing-policy](http://www.gov.uk/guidance/ofquals-whistleblowing-policy)

## 9. Anonymity & confidentiality

- 9.1. In some circumstances, the whistleblower might find it difficult to raise concerns with the nominated member of the Senior Management 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 report the concern without disclosing its source.
- 9.2. Alternatively, whistleblowers or others with concerns about potential malpractice can report the matter directly to Ofqual, which is identified as a 'prescribed body'.<sup>9</sup> Awarding organisations are not prescribed bodies under whistleblowing legislation; however, awarding body investigation teams do give those reporting concerns the opportunity for anonymity where possible/appropriate.
- 9.3. 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, although this cannot always be guaranteed.

## 10. Pupils

The School aims to ensure that:

- 10.1. Pupils at the Portsmouth Grammar School are made to feel comfortable discussing/escalating/reporting malpractice issues of which they are aware; and
- 10.2. The regulations surrounding their assessments, and wider academic integrity, are reiterated to pupils who are undertaking, or who are about to undertake, public examinations. All candidates are issued with an exam handbook in the Christmas Term each year which provides all relevant information, including the regulations, avoiding malpractice and wider academic integrity. In addition, pupils in Years 11 & 13 receive 2 exam briefings a year – the first by the HOY prior to mock exams, and the second by the DHA prior to the final exams. Information posters are also displayed in relevant places.
- 10.3. As part of the procedures outlined in 10.2 above, pupils are provided with specific guidance surrounding the use of AI, including what AI is, when and how it may (or may not) be used in non-examination assessments and how, if used, it must be referenced. The academic dishonesty inherent in not referencing AI usage correctly is also explained, alongside the fact that, if dishonest use of AI is suspected, malpractice procedures will be instigated. The exam handbook which is issued to all candidates during the Christmas Term each year also provides this link to relevant JCQ documentation written specifically for candidates: [AI and assessments](#)

## 11. Associated Policies

This Policy should be read in conjunction with the following PGS policies:

- 11.1. The PGS AI Policy;
- 11.2. The PGS Behaviour & Relationships Policy;

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<sup>9</sup> Reference [www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies](https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies)

- 11.3. The PGS Code of Professional Conduct for Staff;
- 11.4. The PGS Whistleblowing Policy;
- 11.5. The PGS Academic Honesty Policy.



## 12. Allocation of Tasks and Version control

**Allocation of tasks:** The Governing Body has allocated tasks according to the table below:

Task	Allocated to	When / frequency of review
Keeping the policy up to date and compliant with the law and best practice	Deputy Head (Academic & Staff Welfare)	As required, and at least annually
Monitoring the implementation of the policy, relevant risk assessments and any action taken in response and evaluating effectiveness	Deputy Head (Academic & Staff Welfare)	As required, and at least annually
Maintaining up to date records of all information created in relation to the policy and its implementation as required by the GDPR	Deputy Head (Academic & Staff Welfare)	As required, and at least annually
Seeking/receiving input from interested groups (such as pupils, staff, parents) to consider improvements to the School's processes under the policy	Deputy Head (Academic & Staff Welfare)	As required, and at least annually
Formal review	Deputy Head (Academic & Staff Welfare)	Annually

### Version Control

<b>Date Approved</b>	8 <sup>th</sup> October 2025 (SMT)
<b>Date Reviewed</b>	1 <sup>st</sup> October 2025 (ARM)
<b>Next Review Date</b>	Autumn 2026
<b>Policy author (SMT)</b>	Deputy Head (Academic & Staff Welfare)
<b>Status</b>	JCQ Requirement
<b>Report</b>	Recruitment & Staff Guidance Report

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