

NCTJ Whistleblowing policy

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1. Purpose

This policy explains how to report concerns about wrongdoing, malpractice, or maladministration related to NCTJ qualifications, end-point assessments, or services. It ensures individuals can raise concerns without fear of retaliation and outlines the protections available under the Public Interest Disclosure Act 1998 (PIDA).

2. Scope

This policy applies to:

- NCTJ staff and representatives: All staff and representatives involved in the development, delivery, and support of NCTJ qualifications and services.
- Learners: Individuals undertaking NCTJ qualifications, units, or end-point assessments.
- Centres: Organisations approved to deliver NCTJ qualifications and end-point assessments.

3. Definitions

- Learners: Encompasses students, apprentices, or distance learners, at any stage of their journalism training.
- Centres: Encompasses training providers, HEIs, FE colleges and commercial centres.

- Whistleblowing: Reporting suspected malpractice, maladministration, or wrongdoing in the public interest.
- Malpractice: Improper, illegal, or unethical behaviour that affects the delivery, assessment, or management of NCTJ qualifications and services.
- Maladministration: Inefficient or improper management or conduct that affects the quality, integrity, or compliance of NCTJ qualifications and services.
- Whistleblower: An individual (e.g., staff, learners, or centre representatives) who raises concerns about malpractice, maladministration, or wrongdoing.
- Public Interest Disclosure Act (PIDA): Legislation that protects whistleblowers from retaliation when they make a protected disclosure of wrongdoing.
- Protected Disclosure: A qualifying whistleblowing report made in good faith, falling under the criteria set by PIDA, such as reporting criminal acts, health and safety risks, or fraud.

4. Policy Statements

4.1 Legislative context

The NCTJ's whistleblowing policy follows the Public Interest Disclosure Act 1998 (PIDA), which protects workers who report wrongdoing in the public interest. Under this law workers are protected from dismissal or penalties for making a valid whistleblowing disclosure. The Act also has the effect of making confidentiality clauses unenforceable where a protected disclosure is made.

If you're considering whistleblowing, we recommend seeking advice to understand your rights under PIDA. For independent guidance, you can contact Protect, a registered charity specialising in whistleblowing advice: [Protect website](#).

4.2 Responsibilities

- NCTJ: Investigate whistleblowing concerns fairly and appropriately.
- NCTJ Centres:
 - Promote a culture of openness where concerns can be raised without fear of retaliation.
 - Ensure staff and learners are aware of this policy.
- Whistleblowers: Provide as much information as possible to support investigations.

4.3 What is Whistleblowing?

Whistleblowing means reporting suspected malpractice, maladministration or wrongdoing and/or the covering up of malpractice, maladministration or wrongdoing. Officially this is called 'making a disclosure in the public interest'.

Individuals can raise a concern with the NCTJ if they have a reasonable belief that malpractice, maladministration and/or a wrongdoing is occurring or is likely to occur, relating to one or more of the following categories (as set out in the Public Interest Disclosure Act 1998 - PIDA):

- A criminal act (e.g. the unauthorised use of public funds or possible fraud and corruption)
- Breaches of legal obligations.
- A miscarriage of justice
- Health and safety risks.
- Environmental damage.
- Deliberate concealment of information about any of the above.

A whistleblower can also raise a concern with the NCTJ if they think their employer, centre or training provider:

- Will cover up or attempt to cover up the concern raised
- Would treat them unfairly if they raise a concern
- Has not resolved the concern after raising it with them.

Whistleblowing is not the same as:

- Complaints - Personal dissatisfaction with a service (handled under the NCTJ's complaints policy).
- Employment disputes - Workplace disagreements (to be resolved with your employer or another responsible body). The NCTJ cannot investigate or take any action over such instances.

Examples of whistleblowing disclosures that could be made to the NCTJ include:

- A member of staff at a centre making a disclosure about actual, possible or suspected malpractice/maladministration at the centre.
- Making a disclosure about actual, possible or suspected malpractice/maladministration being carried out by a member of the NCTJ.
- A learner or parent/guardian making a disclosure about actual, possible or suspected malpractice/maladministration occurring at a centre delivering NCTJ qualifications.

If you're unsure how to proceed, you can confidentially speak to the NCTJ head of awarding, another NCTJ staff member (see section 7 for contact details), or the charity Protect (see section 4.1).

5. Procedures

5.1 Reporting concerns

- Internally: Where possible, raise concerns first with the centre

- To the NCTJ:
 - Contact the NCTJ head of awarding via the contact details in section 7 of this document.
 - Provide as much information and supporting evidence as possible.

5.2 Investigation process

Once a concern has been raised, the NCTJ have a duty to pursue the matter. It will not be possible to prevent the matter being investigated by subsequently withdrawing the concern, as we are obliged by the regulators to follow-up and investigate allegations of malpractice or maladministration.

An investigator will be appointed to handle the case impartially.

The investigator may contact/meet with the whistleblower to clarify details. If the whistleblower does not wish to make a written statement, the investigator(s) will write a summary of the concern(s) that have been raised and the whistleblower will be expected to confirm this as correct. A work colleague, trade union representative or another individual (e.g. a friend or independent witness) can accompany the whistleblower at this and any subsequent meeting(s).

The investigator will then investigate to establish the facts in accordance with the arrangements in our malpractice and maladministration policy.

We may not disclose details of the investigation activities to the whistleblower, and we are not obliged to disclose details of the outcomes of the investigation. This may be due to confidentiality or legal reasons (e.g. disclose full details on the action that may be taken against the parties concerned).

While we cannot guarantee that we will disclose matters in the way that the whistleblower might wish, we will handle the matter fairly and properly and provide assurance that action has been taken where appropriate.

5.3 Investigation outcomes

If wrongdoing is found, appropriate action will be taken under the NCTJ malpractice and maladministration policy.

If the claim is unproven but made in good faith, no action will be taken against the whistleblower.

Deliberately false allegations may result in disciplinary action.

5.4 External reporting

Ofqual, the NCTJ's regulator in England, oversees regulated qualifications and assessments, including:

- The development, delivery, and awarding of qualifications.
- National Curriculum and Early Years Foundation Stage assessments.
- Other matters related to its role as a regulator in England.

Ofqual's whistleblowing policy advises individuals working for centres delivering regulated qualifications to first report concerns to the relevant awarding organisation, such as the NCTJ. If you report directly to Ofqual, they may refer the matter back to the awarding organisation for investigation.

You can also report a concern directly to the appropriate regulator. Below are links to whistleblowing policies for regulators across the UK:

Ofqual (England): [Ofqual whistleblowing policy](#)

Qualifications Wales: [Regulatory Whistleblowing Policy](#)

CCEA (Northern Ireland): [Raising Concerns at Work](#)

5.5 Protecting your identity

- You may request anonymity, although it is always preferable for you reveal your identity and provide us with your contact details.
- If you are concerned about possible adverse consequences if your identity is revealed to another party, please inform us that you do not wish the NCTJ to divulge your identity and we will work to ensure your details are not disclosed.
- We will try to keep your identity confidential if you request it, but we cannot guarantee this. Your identity may need to be shared with:
 - The police or law enforcement agencies to investigate or prevent crime.
 - The courts if required for legal proceedings.
 - Others third parties, such as Ofqual, if legally necessary or relevant to the investigation.
- Investigators will inform you if your identity must be disclosed.
- A whistleblower should be aware that others might figure out their identity based on the nature or details of the disclosure, even if their identity is not directly revealed.

6. Review arrangements

The NCTJ will review this policy annually as part of the NCTJ's annual self-evaluation arrangements and revise it as and when necessary, in response to customer, learner or regulatory feedback.

If you would like to feedback any views, please contact us via the details provided at the end of this policy.

This policy will be reviewed in September 2027.

7. Contact us

Any queries in relation to the contents of this policy, please contact our head of awarding.

Telephone: 01799 544014

Email: info@nctj.com