



The
Thomas Hardye School

WHISTLEBLOWING POLICY (Exams)

2023/24

This policy is reviewed annually to ensure compliance with current regulations

Approved/reviewed by	
	
Date of next review	October 2024

Key staff involved in the policy/procedure

Role	Name(s)
Head of centre	Nick Rutherford
Senior leader(s)	Iain Cornell, Claire Noble
Exams officer	Christine Boyles

Introduction

Whistleblowing at the Thomas Hardy 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.

The head of centre and governing board at the Thomas Hardy School aim to create and maintain an approach to examinations that reflects an ethical culture, and encourages staff and students to be aware of and report practices that could compromise the integrity and security of examinations.

In compliance with section 5.11 of the JCQ's **General Regulations for Approved Centres**¹, the Thomas Hardy 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 publication **Suspected Malpractice: Policies and Procedures**² and provide such information and advice as the awarding body may reasonably require

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*³.

This policy sets out the whistleblowing procedures at the Thomas Hardy School. It has been reviewed by Iain Cornell who is also a member of the senior leadership team and responsible for handling any cases of whistleblowing. He is fully aware of the contents of this policy and will escalate any instances of malpractice to the relevant awarding body/bodies.

This policy also sets out the principles which allow members of centre staff and students to feel confident in reporting instances of actual, alleged or suspected malpractice to relevant members of senior leadership.

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 if the Thomas Hardy 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.

¹ Reference www.jcq.org.uk/exams-office/general-regulations/

² Reference www.jcq.org.uk/exams-office/malpractice/

³ Reference www.jcq.org.uk/examination-system/imc-home/

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 examinations (such as exams officer, exams assistant or invigilator), a student 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 SLT link for examinations.

However, there will be times when it may be more appropriate to refer the issue directly 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 exams-specific policy, includes reference to exams-related breaches including, but not limited to, the following:

- Failure to comply with exam 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
- 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 exam paper prior to the exam 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 disclosure⁴ 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)⁵ offers you legal protection from being dismissed or penalised for raising certain serious concerns ('blowing the whistle'). Whistleblowing rights under PIDA are day one rights⁶. This means that the worker does not need the same two years' service that is needed for other employment rights.

In order 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
- 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

⁴ Reference www.jcq.org.uk/exams-office/malpractice/public-interest-disclosure-act/

⁵ Reference **Public Interest Disclosure Act 1998** www.legislation.gov.uk/ukpga/1998/23/contents

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

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 it⁷.

Alternatively, a worker could consider making a disclosure to Ofqual⁸ as a prescribed body for whistleblowing to raise a concern about wrongdoing, risk or malpractice.

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'⁹. 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 his/her name, but may also request confidentiality; the person receiving the information should make every effort to protect the identity of the whistleblower.

Students

Students at the Thomas Hardy School are made 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 students who are undertaking, or who are about to undertake, their courses of study.

⁷ Reference www.ocr.org.uk/administration/general-qualifications/assessment/malpractice/whistleblowing/

⁸ Reference www.gov.uk/guidance/ofquals-whistleblowing-policy

⁹ Reference www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies



The
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WORD PROCESSOR POLICY (Exams)

2023/24

This policy is reviewed annually to ensure compliance with current regulations

Approved/reviewed by	
Date of next review	October 2024

Key staff involved in the policy

Role	Name(s)
ALS lead/SBICo	C Noble
Exams officer	C Boyles
Senior leader(s)	C Noble
IT manager	M Faulkner

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This policy is reviewed and updated annually on the publication of updated JCQ regulations and guidance on access arrangements and instructions for conducting exams.

References in this policy to AA and ICE relate to/are directly taken from the [Access Arrangements and Reasonable Adjustments 2023-2024](#) and [Instructions for conducting examinations 2023-2024](#) publications.

Introduction

The use of a word processor in exams and assessments is an available access arrangement/reasonable adjustment.

(AA 4.2.1)

The purpose of an access arrangement/reasonable adjustment is to ensure, where possible, that barriers to assessment are removed for a disabled candidate preventing him/her from being placed at a substantial disadvantage as a consequence of persistent and significant difficulties. The integrity of the assessment is maintained, whilst at the same time providing access to assessments for a disabled candidate.

(AA 4.2.2)

Although access arrangements/adjustments are intended to allow access to assessments, they cannot be granted where they will compromise the assessment objectives of the specification in question.

(AA 4.2.3)

Candidates may not require the same access arrangements/reasonable adjustments in each specification. Subjects and their methods of assessments may vary, leading to different demands of the candidate. ALS leads/SENCOs must consider the need for access arrangements/reasonable adjustments on a subject-by-subject basis.

(AA 4.2.1)

The Additional Learning Support lead/SENCO must ensure that the proposed access arrangement/reasonable adjustment does not unfairly disadvantage or advantage a candidate.

(AA 4.2.7)

The candidate must have had appropriate opportunities to practice using the access arrangement(s)/reasonable adjustment(s) before his/her first examination.

Purpose of the policy

This policy details how The Thomas Hardy School complies with AA chapter 4 (Managing the needs of candidates and principles for centres), section 5.8 (Word processor) and ICE (sections 14.20-27) when awarding and allocating a candidate the use of word processor in examinations.

The term 'word processor' is used to describe for example, the use of a computer, laptop or tablet.

The criteria The Thomas Hardy School uses to award and allocate word processors for examinations and assessments

The 'normal way of working' for exam candidates, as directed by the head of centre, is that candidates handwrite their exams unless there are exceptions.

Exceptions

A candidate may be awarded the use of a word processor in examinations where:

- the candidate may have an approved access arrangement in place, for example the use of a scribe/speech recognition technology
- the candidate has a firmly established need, it reflects the candidate's normal way of working and by not being awarded a word processor would be at a substantial disadvantage to other candidates

The centre will

- allocate the use of a word processor to a candidate with the spelling and grammar check facility/predictive text disabled (switched off) where it is their normal way of working within the centre (AA 5.8.1)
- award the use of a word processor to a candidate where appropriate to their needs
For example, a candidate with:
 - a learning difficulty which has a substantial and long-term adverse effect on their ability to write legibly
 - a medical condition
 - a physical disability
 - a sensory impairment
 - planning and organisational problems when writing by hand
 - poor handwriting (AA 5.8.4)
- only permit the use of a word processor where the integrity of the assessment can be maintained (AA 4.2.1)
- not grant the use of a word processor where it will compromise the assessment objectives of the specification in question (AA 4.2.2)
- consider on a subject-by-subject basis if the candidate will need to use a word processor in each specification (AA 4.2.3)
- process access arrangements/reasonable adjustments at the start of the course, or as soon as practicable having firmly established a picture of need and normal way of working, ensuring arrangements are always approved before an examination or assessment (AA 4.2.4)
- provide the use of word processors to candidates in non-examination assessment components as standard practice unless prohibited by the specification (AA 5.8.2)

The centre will not:

- simply grant the use of a word processor to a candidate because he/she now wants to type rather than write in exams or can work faster on a keyboard, or because he/she uses a laptop at home. (AA 5.8.4)

Additionally the use of a word processor would be considered for a candidate:

- in the event of a temporary injury or impairment, or a diagnosis of a disability or manifestation of an impairment relating to an existing disability arising after the start of the course (AA 4.2.4)
- where the curriculum is delivered electronically and the centre provides word processors to all candidates (AA 5.8.4)

Arrangements at the time of the assessment for the use of a word processor

A candidate using a word processor is accommodated in one of the school's ICT rooms, or in the library, in a room where there is a smaller group of candidates with similar needs.

In compliance with the regulations the centre:

- provides a word processor with the spelling and grammar check/predictive text disabled (switched off) to a candidate where it is their normal way of working within the centre, unless an awarding body's specification says otherwise (ICE 14.20)
- (where a candidate is to be seated with the main cohort without the use of a power point) checks the battery capacity of the word processor before the candidate's exam to ensure that the battery is sufficiently charged for the entire duration of the exam (ICE 14.21)
- ensures the candidate is reminded to ensure that their centre number, candidate number and the unit/component code appear on each page as a header or footer e.g. 12345/8001 – 6391/01 (ICE 14.22)
- If a candidate is using the software application Notepad or Wordpad these do not allow for the insertion of a header or footer. In these instances once the candidate has completed the examination and printed off his/her typed script, he/she is instructed to handwrite their details as a header or footer. The candidate is supervised throughout this process to ensure that he/she is solely performing this task and not re-reading their answers or amending their work in any way.
- ensures the candidate understands that each page of the typed script must be numbered, e.g. page 1 of 6 (ICE 14.23)

- ensures the candidate is reminded to save their work at regular intervals, to ensure that if there is a complication or technical issue, the candidate's work is not lost (ICE 14.24)
- instructs the candidate to use a minimum of 12pt font and double spacing to make marking easier for examiners (ICE 14.24)

(ICE 14.25)

The centre will ensure the word processor:

- is only used in a way that ensures a candidate's script is produced under secure conditions
- is not used to perform skills which are being assessed
- is in good working order at the time of the exam
- is accommodated in such a way that other candidates are not disturbed and cannot read the screen
- is used as a typewriter, not as a database, although standard formatting software is acceptable
- is cleared of any previously stored data
- does not give the candidate access to other applications such as a calculator (where prohibited in the examination), e-mail, the Internet, social media sites, spreadsheets
- does not include graphic packages or computer aided design software unless permission has been given to use these
- does not have any predictive text software or an automatic spelling and grammar check enabled unless the candidate has been permitted a scribe or is using speech recognition technology (a scribe cover sheet must be completed), or the awarding body's specification permits the use of automatic spell checking
- does not include computer reading (text to speech) software unless the candidate has permission to use a computer reader
- does not include speech recognition technology unless the candidate has permission to use a scribe or relevant software
- is not used on the candidate's behalf by a third party unless the candidate has permission to use a scribe

Portable storage medium

(ICE 14.25)

The centre will ensure that any portable storage medium (e.g. a memory stick) used:

- is provided by the centre
- is cleared of any previously stored data

Printing the script after the exam has ended

(ICE 14.25)

The centre will ensure:

- the word processor is either connected to a printer so that a script can be printed off, or have the facility to print from a portable storage medium
- the candidate is present to verify that the work printed is his or their own
- a word processed script is attached to any answer booklet which contains some of the answers
- if a candidate omits to insert the required header or footer, he/she is instructed to handwrite the details as a header or footer; the candidate is supervised throughout this process to ensure that he/she is solely performing this task and not re-reading their answers or amending their work in any way (ICE 14.22)

The centre will also ensure that where an awarding body may require a word processor cover sheet, this is included with the candidate's typed script (and according to the relevant awarding body's instructions). (ICE 14.26)

The centre may retain electronic copies of word processed scripts as the electronic copy of a word processed script may be accepted by an awarding body where the printed copy has been lost. However, the centre would need to demonstrate to the awarding body that the file has been kept securely. The head of centre would be required to confirm this in writing to the awarding body. (ICE 14.27)

Allocating word processors at the time of the assessment

Appropriate exam-compliant word processors will be provided by the IT department in liaison with the ALS lead/SENCo and the exams officer.

In exceptional circumstances where the number of appropriate word processors may be insufficient for the cohort of candidates approved to use them in an exam session, the cohort will be split into two groups. One group will sit the exam earlier than or later than the awarding body's published start time. The security of the exam will be maintained at all times and candidates will be supervised in line with section 7 of ICE.]

