



WHISTLEBLOWING POLICY



Version Number	Date	Purpose of Change	Classification	Sign Off
V4.1	20/10/2025	Merge of EPA, NOPS and Awarding policies - new content and formatting	Public	Kerry Ore

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SCOPE

1.1 This policy applies to all Smart Awards staff, contractors, centres, assessors, verifiers, employers, learners, and organisations engaged in the development, delivery, and quality assurance of Smart Awards qualifications or the Network Operative Passport Scheme (NOPS). It provides a mechanism for individuals and organisations to raise concerns about suspected wrongdoing, malpractice, maladministration, or unethical behaviour without fear of reprisal.

1.2 This policy aligns with Ofqual General Conditions, Ofqual EPA Conditions, and SQA Accreditation Principles.

RESPONSIBILITIES

2.1 Smart Awards has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. Smart Awards has the day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness and dealing with any queries on its interpretation.

2.2 Everyone covered by this policy has the right to raise concerns without fear of retaliation and a duty to do so in good faith.

2.3 Roles

Smart Awards Responsible Officer	Overall responsibility for managing concerns, ensuring compliance with regulatory requirements, maintaining the risk register, and reporting to regulators.
Smart Awards Quality Team	Day-to-day monitoring, investigation, evidence collection, and communication with centres.
Centre Managers / Assessors / Organisations	Immediate notification of any potential or actual concerns to Smart Awards, completion of initial incident report, and cooperation during investigation. Centres and organisations must promote a culture where it is acceptable to report concerns and ensure staff understand their responsibilities under this policy.
All Staff and Contractors	All staff including contractors, centres, assessors, verifiers, and organisations working with Smart Awards are required to familiarise themselves with this policy and act in accordance with it.

WHISTLEBLOWING

3.1 Whistleblowing is the disclosure of information by an individual or organisation who reasonably believes that wrongdoing has occurred, is occurring, or is likely to occur. This may include criminal offences, breaches of health and safety, miscarriages of justice, environmental damage, malpractice, maladministration, or concealment of such acts.

3.2 The disclosure must be made in the public interest as defined under the Public Interest Disclosure Act 1998, as amended by the Employment Rights Act 1996 and the Enterprise and Regulatory Reform Act 2013.

Application To Qualifications

3.3 Individuals or centres delivering Smart Awards qualifications should use this policy to report concerns about suspected wrongdoing that could impact the integrity, validity, or fairness of qualifications, assessments, or learner outcomes.

Application To NOPS

3.4 Individuals and organisations accessing or managing the Network Operative Passport Scheme (NOPS) must use this policy to report any concerns relating to data accuracy, fraudulent entries, or misuse of the system.

3.5 Smart Awards retains overall responsibility for investigating and resolving all suspected issues relating to NOPS operations or associated financial irregularities.

REPORTING A CONCERN

4.1 Concerns should be raised verbally or in writing to Smart Awards via the Quality Team or Responsible Officer. Reports should include details of the concern, any evidence available, and the names of individuals involved.

4.2 All concerns will be acknowledged within one working day, treated confidentially and with sensitivity, and an indicative timescale for investigation will be provided.

4.3 Anonymous reports will be considered, but investigations may be limited where information is insufficient.

4.4 The Public Interest Disclosure Act 1998, as amended, protects individuals from detrimental treatment or victimisation if, in the public interest, they disclose wrongdoing. This protection applies whether the disclosure relates to Smart Awards qualifications or NOPS.

4.5 While Smart Awards encourages internal reporting, individuals may also seek advice, or report concerns externally through the following channels:

- Trade Union
- Citizens Advice Bureau
- Relevant Professional or Regulatory Body
- The Police
- Ofqual or SQA Accreditation

5. INVESTIGATION AND OUTCOMES

5.1 Smart Awards will assess all whistleblowing reports to determine whether an investigation is required. Investigations will be impartial, fair, and carried out by individuals with no conflict of interest.

5.2 Investigations will follow Smart Awards' investigation procedures, and outcomes will be communicated to the whistleblower within 28 days where possible.

5.3 Whistleblowers acting in good faith will not suffer any detriment, victimisation, or harassment. Malicious or knowingly false allegations may result in disciplinary action.

6. REPORTING TO THE REGULATOR

6.1. If appropriate, the incident will be reported to the regulators at the earliest opportunity, using the event notification on Ofqual portal. The following is information that is required to be documented on Ofqual portal.

- Title of the event
- Date of the event
- Date became aware of the event
- Reason for delays (if applicable)
- AO reference
- How did you become aware of the event

- Nature and cause of the event
- Adverse effect type
- Description
- Who is aware of the event
- Details of the event
- Date of any updates
- More information about the event
- Affected qualifications
- Affected centres
- Affected learners
- Region – England, Wales, Northern Ireland, Scotland
- Nature of the event
- Incorrect results
- Action taken
- Compliance

7. VALIDITY

7.1 Smart Awards will ensure that all whistleblowing investigations maintain fairness, transparency, and proportionality. All outcomes will be reviewed to confirm that qualifications, assessments, and NOPS records remain valid, reliable, and trustworthy.

8. REVIEW OF THIS POLICY

8.1 This policy is reviewed annually, or sooner if required, in response to feedback, legislative updates, or regulatory guidance from Ofqual, SQA Accreditation, or other relevant authorities.

9. PROCESS FOR RAISING A WHISTLEBLOWING CONCERN

Process Step Description	Process	Person Responsibility	Activity
Identification	Process	Smart Awards Staff, Learner, EQA, Assessor, Employer, Provider, Centre, Organisation	Written formal communication to Smart Awards Quality Team and/or Responsible Officer
Acknowledgement	Process	Quality Team	Acknowledge receipt of the concern within 1 working day
Initial Review	Process	Quality Team	Collect evidence and identify potential scope and impact
Formal Investigation	Process	Responsible Officer	Investigate, interview relevant parties, maintain confidentiality
Mitigation of Risk	Process	Responsible Officer	Implement corrective actions and record on the risk register
Report to regulators	Process	Responsible Officer	Raise an event notification on Ofqual Portal
Communicate outcome	Process	Responsible Officer	Written report to all parties
Lessons learned	Process	Responsible Officer	Prevent recurrence
Keep under review on risk register	Process	Board	Board awareness and review
Closure	End	Responsible Officer	Close down

10. OFQUAL GENERAL CONDITIONS

10.1 A8.3: Maintain up-to-date written procedures for investigating suspected or alleged malpractice or maladministration.

10.2 B3.2: Notify Ofqual promptly of any event that could have an Adverse Effect, including whistleblowing disclosures.

10.3 C2.3: Ensure investigations are conducted rigorously, effectively, and by persons with appropriate competence.

10.4 PR1.1 An awarding organisation must conduct its activities in a way that is designed to facilitate its adherence to the following principles:

- (a) Principle 1 – An awarding organisation must act with honesty and integrity.
- (b) Principle 2 – An awarding organisation must treat Learners fairly by acting and taking decisions with due impartiality and based on appropriate evidence.
- (d) Principle 4 – An awarding organisation must act in a way that maintains and, where possible, promotes public confidence in qualifications.
- (e) Principle 5 – An awarding organisation must act in an open, transparent and co-operative manner with Ofqual and, as appropriate, with Users of qualifications.

11. QUALIFICATIONS SCOTLAND ACCREDITATION PRINCIPLES

11.1 Principle 16: The awarding body and its providers must have open and transparent systems, policies, and procedures to manage complaints and whistleblowing.