

WHISTLEBLOWING POLICY

PMQ Qualifications

Apprenticeship Assessment

V1.0

Issued: 15 June 2026

Effective from: 15 June 2026

Purpose

1. Propertymark Qualifications (PMQ) is committed to maintaining high standards of openness, honesty, and integrity in the delivery of its qualifications, for the benefit of training providers, candidates, and the wider public. This Whistleblowing Policy sets out PMQ's approach to receiving, handling, and responding to disclosures of suspected wrongdoing.
2. This policy provides guidance for individuals who wish to raise concerns about malpractice or wrongdoing in relation to PMQ qualifications and apprenticeship assessments and supports a consistent, fair, and transparent approach to managing such disclosures.

Definitions

3. **Candidate** – In the context of this policy, this term includes all individuals studying PMQ qualifications and preparing for apprenticeship assessments.
4. **Assessment(s)** – In the context of this policy, assessment(s) includes examinations or assessments taken towards PMQ qualifications and apprenticeship assessments.
5. **Whistleblowing** – The disclosure of information by a worker relating to suspected wrongdoing in the public interest.
6. **Informant** – A person who provides information. Candidates are not classed as workers and are therefore not legally defined as whistleblowers but may still raise concerns with PMQ.
7. **Complaint** – An expression of personal dissatisfaction, which will be handled in accordance with the PMQ Complaints Policy.
8. **Employment Dispute** – A dispute relating to an individual's employment position or contract. PMQ does not intervene in such matters.

Scope

9. This policy applies to:
 - Candidates
 - Training providers, and their staff
 - Contractors involved in the assessment or delivery of assessments
 - PMQ staff and associated contractors involved in the assessment or delivery process

Key Principles

10. PMQ encourages individuals to raise concerns about suspected wrongdoing and will ensure that disclosures are taken seriously and considered appropriately.
11. Individuals raising concerns will be treated fairly, and their confidentiality will be respected, subject to legal or regulatory requirements.
12. Disclosures should be made with a reasonable belief that the information is true and in the public interest.
13. Whistleblowing is distinct from complaints and employment disputes and will be managed separately to ensure appropriate handling.

Before Making a Disclosure

14. Individuals considering making a disclosure should take reasonable steps to protect themselves and the integrity of the information being shared. This may include:
 - avoiding discussing concerns widely to maintain confidentiality
 - considering how best to maintain confidentiality when making a disclosure, including the method and location used to raise concerns
 - retaining relevant evidence where safe and lawful to do so
 - seeking independent advice where appropriate

Confidentiality & Anonymity

15. PMQ will not normally disclose the identity of a whistleblower or informant without their consent.
16. There may be circumstances where disclosure is required, including where legal or regulatory bodies are involved.
17. Anonymous disclosures may be accepted; however, PMQ may only be able to act where sufficient information is provided.
18. Individuals should be aware that, depending on the nature of the concern, they may be identifiable.

Raising a Concern

19. Disclosures can be made to PMQ using the following contact details:

- **Email:** pmggovernance@propertymark.co.uk
- **Telephone:** 01926 417 794

20. Where disclosures are made by telephone, PMQ may ask the information to be submitted in writing for complete and accurate audit.

21. To support effective investigation, individuals should provide:

- The name of the training provider
- Details of the concern
- The number of candidates affected (and names where possible)

Receipt & Handling of Disclosures

22. On receipt of a disclosure, PMQ will review the information provided and determine the most appropriate course of action. This may include:

- Investigating the concern
- Conducting further enquiries
- Referring the matter to the relevant training provider
- Escalating to regulators where appropriate

23. Where possible, PMQ will inform the individual whether the concern was substantiated.

24. Detailed findings will not normally be shared due to confidentiality and commercial sensitivity.

Legal Framework

25. The Public Interest Disclosure Act 1998 provides protection for workers who make disclosures in the public interest, subject to certain conditions. Protection generally applies where an individual:

- Is classed as a worker
- Reasonably believes wrongdoing has occurred, is occurring, or may occur
- Makes a disclosure with a reasonable belief that it is in the public interest
- Raises the concern through an appropriate route

26. Examples relevant to PMQ may include:

- Malpractice in assessment delivery

- Examination security breaches
- Fraudulent certification claims
- Failure to follow qualification requirements

27. Qualifying disclosures may relate to:

- Criminal offences
- Failure to comply with legal obligations
- Miscarriages of justice
- Risks to health and safety
- Environmental damage
- Attempts to conceal wrongdoing

28. Protection does not apply where:

- The individual breaks the law in making the disclosure
- The information is subject to legal professional privilege

Regulatory Oversight

29. PMQ works with the following regulators:

- Ofqual
- CCEA
- Qualifications Wales

30. Where appropriate, PMQ will notify the relevant regulator of suspected malpractice in line with regulatory requirements.

Policy Review Arrangements

31. This policy is subject to a three-year review cycle. However, it may be reviewed more frequently to reflect regulatory changes, operational feedback, or identified risks.

32. This policy is also reviewed as part of PMQ's ongoing quality assurance and continuous improvement processes.