

Whistleblowing Policy for Candidates

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Author and Approval		
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1. Purpose

1.1 The purpose of this policy is to provide a safe, confidential, and clearly defined process for candidates to raise serious concerns about wrongdoing, malpractice, risk, or misconduct connected with the delivery, administration, assessment, or governance of the Dental Specialty Fellowship Examinations and MFDS examinations.

1.2 This policy supports the integrity, fairness, reliability, and public confidence of the Dental Examinations Executive (“the Executive”) examinations by encouraging candidates to report concerns in good faith and without fear of disadvantage.

2. Scope

2.1 This policy applies to all candidates who are applying for, registered for, currently taking, or have taken the Dental Specialty Fellowship Examinations or MFDS examinations, normally within the previous 30 calendar days, unless the concern could not reasonably have been raised earlier or relates to serious wrongdoing, concealment, retaliation, or examination integrity.

2.2 The policy covers serious concerns relating to the examination process, including suspected malpractice; improper access to confidential examination content; security failures; serious administrative or assessment irregularities; improper conduct by candidates, examiners, invigilators, staff, contractors, suppliers, or other individuals involved in examination delivery; discrimination, harassment, victimisation, bullying, or abuse of power connected to the examination process; attempts to conceal wrongdoing; and retaliation against a person who has raised a concern.

2.3 This policy does not replace normal procedures for examination appeals or for candidate complaints.

3. Definition of whistleblowing

3.1 For the purposes of this policy, whistleblowing means raising a serious concern about wrongdoing, risk, malpractice, or misconduct that may affect the fairness, integrity, security, or proper governance of examinations delivered by the Executive.

3.2 In UK law, whistleblowing is commonly described as making a disclosure in the public interest (Public Interest Disclosure Act 1998). This policy provides a route for candidates to raise concerns and confirms that candidates who raise concerns in good faith will not be penalised or disadvantaged for doing so.

3.3 The Executive is a UK-based organisation and this policy is operated in accordance with UK governance expectations, including the principles reflected in the Public Interest Disclosure Act 1998 where applicable. The availability of statutory whistleblowing protection may depend on the individual's status, relationship with the Executive, location, applicable law, and the circumstances of the disclosure. Nothing in this policy limits any statutory rights or protections that may apply in the UK or in any other jurisdiction. Regardless of whether statutory whistleblowing protection applies, the Executive will not penalise, disadvantage, victimise, or retaliate against any candidate, examiner, witness, or other person for raising a concern in good faith under this policy.

4. Principles

4.1 Seven principles govern this policy. They are as follows.

4.1.1 Fairness: concerns will be assessed and handled impartially and objectively.

4.1.2 Confidentiality: the identity of the person raising the concern will be protected as far as reasonably possible.

4.1.3 No retaliation: candidates must not be penalised, victimised, harassed, threatened, or disadvantaged for raising a concern in good faith.

4.1.4 Timeliness: concerns will be acknowledged, assessed, and investigated within reasonable timescales.

4.1.5 Proportionality: the response will reflect the seriousness, risk, evidence, and potential impact of the concern.

4.1.6 Integrity of assessment: the overriding priority is to protect the fairness, reliability, confidentiality, and security of the examinations.

4.1.7 Natural justice: individuals who are the subject of allegations will be treated fairly and given an appropriate opportunity to respond where this does not compromise an investigation.

5. Examples of concerns that should be raised under this policy

5.1 The following list of examples is illustrative and not exhaustive:

5.1.1 A candidate has obtained, shared, solicited, bought, sold, or attempted to access confidential examination materials.

5.1.2 A candidate is using an impersonator, receiving unauthorised help, or participating in collusion.

5.1.3 An examiner, invigilator, staff member, contractor, supplier, or other person involved in delivery has acted improperly.

5.1.4 Examination materials have been leaked, circulated, photographed, copied, or posted online.

5.1.5 Assessment or results processes appear to have been affected by bias, discrimination, or improper influence.

5.1.6 A serious incident has been concealed or misreported.

5.1.7 A candidate or witness has been pressured, threatened, intimidated, or disadvantaged because they raised or may raise a concern.

6. Concerns not normally handled under this policy

6.1 The following matters should normally be handled through other procedures unless they involve serious wrongdoing, concealment, or retaliation:

Concern	Governing policy
A procedural defect affected your results	Dental Examinations Executive Appeals Policy and Procedure
Dissatisfaction with service quality	Dental Examinations Executive Complaints Policy and Procedure
Requests for reasonable adjustments	Access Arrangements and Reasonable Adjustments Policy and Procedure for Examination Candidates

6.2 Where a concern contains both whistleblowing and non-whistleblowing elements, the whistleblowing element will be considered under this policy and the remaining issues may be referred to the appropriate procedure.

6.3 The following matters are not normally handled under this policy unless they involve serious wrongdoing, concealment, or retaliation.

6.3.1 Routine dissatisfaction with the outcome of an examination

6.3.2 Personal grievances unrelated to examination integrity

6.3.3 Disagreement with the examination format or syllabus

7. How to raise a concern

7.1 Candidates should raise concerns as soon as reasonably possible after becoming aware of the issue. Early reporting helps preserve evidence and allows risks to examination integrity to be managed promptly.

7.2 Concerns should normally be submitted in writing to the Quality and Standards Team via email to qualityandstandards@dsfe.org.uk.

7.3 Where the concern relates to the named contact or where the candidate believes that route is inappropriate, the candidate may raise the concern with the Executive's Director via email to Fiona.winter@dsfe.org.uk.

7.4 Candidates should provide as much relevant information as possible, including what happened, when and where it happened, who was involved, how they became aware of the matter, whether anyone else may have evidence, and any documents, screenshots, messages, or other supporting information. Please see Appendix A for suggested information to include when raising a concern.

7.5 Candidates should not attempt to obtain evidence unlawfully or place themselves or others at risk.

8. Anonymous and confidential reporting

8.1 Candidates may request that their identity is kept confidential. The Executive will take reasonable steps to protect confidentiality and will disclose the candidate's identity only where necessary, proportionate, lawful, and relevant to managing the concern or complying with obligations.

8.2 Anonymous reports may be considered. However, anonymity may limit the ability to clarify details, investigate fully, or provide updates. Anonymous reports should include enough information to allow the concern to be assessed.

8.3 Where disclosure of identity may become necessary, the candidate will normally be informed in advance unless doing so would compromise the investigation, prejudice legal or regulatory obligations, or create an immediate risk to examination integrity or safety.

9. Protection from retaliation

9.1 No candidate who raises a concern in good faith under this policy will be disadvantaged, penalised, victimised, harassed, threatened, or treated less favourably in active or future examinations.

9.2 Retaliation against a candidate, witness, or other person involved in a whistleblowing concern may itself be treated as a serious disciplinary, conduct, or malpractice matter.

9.3 If a candidate believes they have suffered retaliation or disadvantage after raising a concern, they should report this immediately using the contact route in this policy.

10. Bad-faith or knowingly false allegations

10.1 Concerns raised in good faith will be treated seriously, even if they are not ultimately substantiated.

10.2 Candidates must not knowingly make false, malicious, vexatious, or deliberately misleading allegations. Such conduct may be considered under the Candidate Code of Conduct.

11. Initial assessment

11.1 On receipt of a concern, the Executive will acknowledge the report normally within five working days where contact details have been provided.

11.2 The concern will be subject to an initial assessment to determine whether it falls within this policy; whether urgent action is required to protect examination integrity, candidate safety, confidentiality, or evidence; whether another procedure is more appropriate; what information is available; and whether a formal investigation is required.

11.3 Where the matter is redirected to another procedure, the candidate will normally be informed of the route being used, subject to confidentiality and investigation constraints.

12. Investigation process

12.1 Where a formal investigation is required, this will be led by the Deputy Head of Quality Assurance. Where the Deputy Head of Quality Assurance has a conflict of interest, is implicated in the concern, or is otherwise not an appropriate investigator, the Executive will appoint an alternative suitably senior and independent investigator.

12.2 The investigation may include reviewing documents and examination records; interviewing relevant individuals; reviewing invigilation reports, candidate communications, assessment-system logs, or security records; seeking specialist advice; and considering whether interim action is needed.

12.3 Interim action may include preserving records, restricting access to materials, pausing release of affected results, notifying relevant governance leads, or implementing temporary controls. Any interim action should be proportionate and should not imply that allegations have been proven.

12.4 Individuals who are the subject of allegations will be treated fairly. They will normally be informed of the substance of the concern and given an opportunity to respond, unless doing so would prejudice the investigation, compromise confidentiality, or create a risk to examination integrity.

13. Outcomes

13.1 Possible outcomes following investigation may include:

13.1.1 No further action,

13.1.2 Referral to a complaints, appeals, malpractice, disciplinary, regulatory, or contractual process,

13.1.3 Corrective action to examination administration or security controls,

13.1.4 Review of assessment processes,

13.1.5 Training or guidance,

13.1.6 Referral to senior governance,

13.1.7 Notification to the General Dental Council or other authority where required,

13.1.8 or other proportionate action.

13.2 The candidate who raised the concern will normally be told when the matter has concluded and may be provided with a summary outcome, where appropriate. The level of detail shared may be limited by confidentiality, data protection, legal privilege, regulatory obligations, or the rights of other individuals.

14. Timescales

14.1 The Executive will aim to acknowledge concerns within five working days where contact details are provided.

14.2 An initial assessment will normally be completed within ten working days of acknowledgement, unless the matter is complex, urgent, or requires immediate safeguarding of examination integrity.

14.3 Formal investigations will be completed as promptly as reasonably possible. Where an investigation is expected to take longer than twenty working days, the candidate will normally receive an update, subject to confidentiality and investigation constraints.

14.4 Complex concerns, concerns involving multiple candidates or examination diets, concerns requiring technical evidence, or concerns overlapping with external processes may take longer.

15. Records and data protection

15.1 Records of concerns, assessments, investigations, evidence, decisions, and outcomes will be kept securely and only accessed by those with a legitimate business need.

15.2 Personal data will be handled in accordance with UK General Data Protection Regulation and the Data Protection Act 2018 as outlined in the Executive's Privacy Statement.

15.3 Records will be retained in line with the Executive's records retention schedule and legal, regulatory, and examination-governance requirements.

15.4 Candidates should not share personal data, confidential examination content, or other sensitive material more widely than necessary when raising a concern.

Appendix A: Suggested information to include when raising a concern

Information	Candidate notes
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Your contact details	Provide these if you are willing to be contacted. State if you request confidentiality.
Exam and sitting	State Specialty or MFDS, part/component, date, location or assessment centre, and candidate number if relevant.
What happened	Describe the concern clearly and factually.
Who was involved	Provide names or roles if known.
When and where	Include dates, times, locations, rooms, online platforms, or assessment systems where relevant.
Evidence	Attach relevant documents, screenshots, messages, or details of witnesses where lawful and safe to do so.
Urgency or risk	Explain whether immediate action may be needed to protect examination integrity or safety.
Confidentiality concerns	Explain any concern about retaliation, conflict of interest, or why a particular route is inappropriate.