1. Introduction

1.1 The College is committed to operating in an ethical and principled way. The aim of this policy and procedure is to provide employees, Governors and workers (referred to as 'workers' in this policy) with a means for raising genuine concerns of suspected:

- criminal offences;
- miscarriages of justice;
- breaches of any legal obligations;
- situations where danger is posed to the health and safety of any individual;
- situations where there is damage to the environment;
- bribery;
- facilitation of tax evasion;
- financial fraud or mismanagement;
- sexual harassment and/or
- deliberate concealment of any of the above.

1.2 The College encourages workers to raise genuine concerns about suspected wrongdoing at the earliest practicable stage. This policy and procedure is intended to provide safeguards to enable members of staff to raise genuine concerns about malpractice in connection with the College without fear of reprisals, even if they turn out to be mistaken.

1.3 This policy and procedure also aims to encourage workers to raise genuine concerns through internal College procedures without fear of adverse repercussions being taken against them. The law allows workers to raise such concerns externally and this policy informs workers how they can do so. However, a failure to raise a concern under this procedure may result in a disclosure losing its protected status under the law.

1.4 This policy and procedure also seeks to balance the need to allow a culture of openness against the need to protect other workers against vexatious allegations or allegations which are not well-founded.

1.5 The principles of openness and accountability which underpin legislation protecting whistleblowers are reflected in this policy and procedure. The College is also committed to ensuring compliance with the Bribery Act 2010 and the Economic Crime and Corporate Transparency Act 2023.

2 Applicability of this Policy and Procedure

2.2 This policy applies to all employees, including apprentices, officers, consultants, contractors, volunteers (including Governors), casual workers and agency workers It is not directed at learners who can instead raise genuine concerns about suspected wrongdoing by making a complaint to the Vice Principal Quality and People.

2.3 Any worker who is unsure whether to raise their concern under this policy and procedure or as a personal grievance procedure, is encouraged to approach the Head of HR in confidence for advice.

3 Protected Disclosures

3.1 The law protects workers who, out of a sense of public duty, want to reveal suspected wrongdoing or malpractice.

3.2 The law allows workers to raise what it defines as a 'protected disclosure'.

4 Types of Wrongdoing

4.1 If, in the course of employment, a worker becomes aware of information which they reasonably believe tends to show

one or more of the following, they must use this policy and procedure:

- that a criminal offence has been committed, is being committed or is likely to be committed;
- that an individual has failed, is failing or is likely to fail to comply with any legal obligation to which they are subject;
- that a miscarriage of justice has occurred, is occurring, or is likely to occur;
- that the health or safety of any individual has been, is being, or is likely to be, endangered;
- that the environment, has been, is being, or is likely to be, damaged;
- that bribery has occurred, is occurring, or is likely to occur;
- that tax evasion has occurred, is occurring, or is likely to occur;
- that an individual may have committed or attempted to commit financial fraud or financial mismanagement;
- that sexual harassment has occurred, is occurring, or is likely to occur and/or
- That information tending to show any of the above, is being, or is likely to be, deliberately concealed.

5 Procedure for Making a Disclosure

5.1 Information which a worker reasonably believes tends to show one or more of the situations given in Section 4 should promptly be disclosed to the Vice Principal, Finance and Infrastructure or any member of - Executive Team so that any appropriate action can be taken:

5.2 If the disclosure relates to the Principal and Chief Executive and/or a member of the Executive Team, a worker can raise the issue with the Clerk to the Corporation. In the event that the disclosure relates to the Clerk to the Corporation, a worker can raise the issue with the Chair of Governors.

5.3 Workers are encouraged to identify themselves when making a disclosure. If an anonymous disclosure is made, the College will not be in a position to clarify any aspect of the disclosure as part of any investigation or notify the individual making the disclosure of the outcome or action taken by the College, to the extent that it is able to do so. The College reserves the right to determine whether to apply this procedure in respect of an anonymised disclosure in light of the following considerations:

- The seriousness of the issues raised in the disclosure;
- How likely it is that the concern can be confirmed from attributable sources.

5.4

For further guidance in relation to this policy and procedure, or concerning the use of the disclosure procedure generally, employees should speak in confidence to the Vice Principal, Finance and Infrastructure.

6 Procedure for Investigating Disclosures

6.1 When a worker makes a disclosure, the College will acknowledge its receipt, in writing, within a reasonable time.

6.2 The College will carry out an initial assessment to determine the scope of any investigation. It will inform the worker of the outcome of its assessment.

6.3 The College will determine the appropriate action to take (including action under any other applicable College policy or procedure). Possible actions could include internal investigation; referral to the College's auditors; or referral to relevant external bodies such as the police, OFSTED, Health and Safety Executive or the Information Commissioner's Office.

6.4 Where a disclosure relates to sexual harassment, the College will determine whether it is appropriate to follow this Whistleblowing Policy or the Grievance Policy. Disclosures that raise wider concerns that are in the public interest will be addressed through this Whistleblowing Policy (for example, concerns about a culture of sexual harassment). Complaints that relate to an individual's personal treatment are more likely to be addressed under the Grievance Policy. The College will make this decision based on the nature and circumstances of the complaint.

6.5 If appropriate, any internal investigation will be conducted by a manager of the College without any direct association with the individual to whom the disclosure relates, or by an external investigator appointed by the College as appropriate. In some cases, the College may appoint a team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter.

6.6 Any recommendations for further action made by the College will be addressed to the Principal and Chief Executive, as appropriate, in the circumstances. The recipient will take all steps within their power to ensure the recommendations are implemented unless there are good reasons for not doing so.

6.7 The worker making the disclosure will usually be notified of the outcome of any action taken by the College under this policy and procedure within a reasonable period of time. However, sometimes the need for confidentiality may prevent the College giving the worker specific details of the investigation or any disciplinary action taken as a result. Workers should treat any information about the investigation as confidential.

6.8 If the worker is not satisfied that their concern has been appropriately addressed, they can raise it with the Principal and Chief Executive. The Principal and Chief Executive will make a final decision on action to be taken and notify the worker making the disclosure.

6.9 There may be circumstances where the College concludes that the disclosure is without substance or merit or it is not appropriate to carry out further investigations. This might apply where:

- the College is satisfied that a worker does not have a reasonable belief that suspected malpractice is occurring;
- the matter is already the subject of legal proceedings or appropriate action by an external body; or
- the matter has already been raised and is being investigated or has been investigated and appropriate action has been taken.

7 Safeguards for Workers Making a Disclosure

7.1 A worker making a disclosure under this procedure can expect their matter to be treated confidentially by the College and, where applicable, their name will not be disclosed to anyone implicated in the suspected wrongdoing, without their prior approval.

7.2 The College will take all reasonable steps to ensure that any report of recommendations, or other relevant documentation, produced by the College does not identify the worker making the disclosure without their written consent, or unless the College is legally obliged to do so, or for the purposes of seeking legal advice.

7.3 No formal disciplinary action will be taken against a worker on the grounds of making a disclosure made under this policy or procedure. This does not prevent the College from bringing disciplinary action against a worker where the College has grounds to believe that a disclosure was made maliciously or vexatiously, or where a disclosure is made outside the College without reasonable grounds.

7.4 A worker will not suffer dismissal or any detrimental action or omission of any type (including informal pressure or any form of victimisation) by the College for making a disclosure in accordance with this policy and procedure. Equally, where a worker is threatened, bullied, pressurised or victimised by a colleague for making a disclosure, disciplinary action will be taken by the College against the colleague in question.

8. Disclosure to External Bodies

8.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases, workers should not find it necessary to alert anyone externally.

8.2 The law recognises that, in some circumstances, it may be appropriate for workers to report concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media. The College strongly encourages

workers to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect (formerly Public Concern at Work), operates a confidential helpline.

8.3 Workers may make a disclosure to an appropriate external body prescribed by the law. This list of 'prescribed' organisations and bodies can be found in information on the GOV.UK website.

9. Accountability

9.1 The College will keep a record of all concerns raised under this policy and procedure (including cases where the College deems that there is no case to answer and therefore that no action should be taken) and will report to the Audit Committee on an annual basis as appropriate.

10. Further Assistance for Workers

10.1 The College will not tolerate any harassment or victimisation of workers who make disclosures. If, at any stage of this procedure a worker feels that they are being subject to informal pressures, bullying or harassment due to making a disclosure, they should raise this matter, in writing, to the Principal and Chief Executive.

10.2 Staff must not threaten or retaliate against whistleblowers in any way and staff that are found to be involved in such conduct may be subject to disciplinary action.

10.3 A worker making a disclosure may want to confidentially request counselling or other support from the College's occupational health service. Any such request for counselling or support services should be addressed to the Head of HR. Such a request would be treated in confidence.

10.4 Workers can also contact the charity Protect (formerly known as Public Concern at Work) for confidential advice on whistleblowing issues. Contact details are as follows:

Protect Advice Line: 020 3117 2520
Protect Advice Line: https://protect-advice.org.uk/contact-protect-advice-line/

The advice line is staffed Mondays, Tuesdays and Thursdays 9.30am to 1.00pm, 2.00pm to 5.30pm
Wednesdays and Fridays 9.30am to 1.00pm

11. Location and Access to the Policy

11.1 The Whistleblowing (Public Interest Disclosure) Policy and supporting policies and other documents are available via CollegeiP and the College website

12. Policy Status

Responsibility:	Clerk to the Corporation
Approved by:	Audit Committee
Review Date:	March 2026
Next Review Date:	March 2028

Equality Analysis

Screening for effects on equality	
Name of policy, procedure, strategy or decision:	Whistleblowing
Project lead completing screening:	Nils Elgar
Position:	Clerk to the Corporation
Directorate:	n/a
What is the aim, objective or purpose of the policy, procedure, strategy or decision?	
• In the interests of openness and accountability to protect workers who wish to raise genuine concerns	
Does the policy affect service users, employees or the wider community, and therefore potentially have a significant effect in terms of equality? *(The relevance of a policy will depend not only on the number of those affected but also by the significance of the effect on them.)*	
• Everyone	
Does it relate to an area with known inequalities? *(e.g. access for disabled people, racist/homophobic bullying).*	
• No	
Have you already consulted with people about this work? If yes briefly describe what you did and with whom. Is there any external or additional research that you can use to support the development of this policy?	
• AoC model consultation took place nationally (for original version dated 2014). There has been no updated guidance since then. This draft has been compared with the Law Society 'Model Whistleblowing Policy Template'. • Online research regarding inclusion of a worker reporting or complaining about sexual harassment as a qualifying disclosure for whistleblowing	
Does it relate to a college objective associated to equality?	
• No	
What data are available to facilitate the screening of the policy?	
• Annual Report to the Audit Committee • Audit controls	

Is there any evidence of higher or lower participation, uptake, exclusion or impact by the following characteristics				
	Higher	**Lower**	**No difference**	**Evidence**
Age				So few raised its impossible to analyse
Disability				
Gender reassignment				
Pregnancy and maternity				
Race				
Religion or belief				
Sex				
Sexual orientation				

If you have identified adverse impact on any group, could this:		
Be seen as discriminatory (either directly or indirectly)?	Yes ☐	No ☐
Have a negative effect of equality of opportunity between different groups of people?	Yes ☐	No ☐
Prevent or discourage participation by any individual or group due to their protected characteristic	Yes ☐	No ☐
If the answer to any of the above questions is yes a full Equality Analysis must be completed		
Full equality analysis to be completed?	Yes ☐	No ☐
Equality analysis to be completed by		

Priority	High	Medium	Low

Please list the outcome following this screening for effects on equality (*i.e. no changes, some changes, further work needed around particular groups or cease development of the policy).*

- Can be made available in any format
- Available on-line

Please sign and date this form, keep one copy and send one a copy to the Vice Principal Quality & People

Signed:	Date:

Review/Change History:

Version	Description/Detail of Update & Name of Person who has carried out Update	Approval	Date of Issue
V3	Nils Elgar – inclusion of sexual harassment as a qualifying disclosure; provision of contact details of key individuals that may receive a whistleblowing notification; updating organisation to whom fraud may be reported to (DfE) and related guidance; inclusion of relevant hyperlinks.	Audit Committee	26 April 2026
V2	Nils Elgar – update to titles, minor tidying up on language, update on contact details for Protect (charity providing advice on whistleblowing issues)	Audit Committee	5 March 2024