BHASVIC

WHISTLEBLOWING POLICY AND PROCEDURES

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WHISTLEBLOWING POLICY AND PROCEDURES

1. Purpose

The College is committed to openness, honesty and accountability. We want staff and others connected to the College to feel safe raising serious concerns about wrongdoing, risk or poor practice.

This policy explains how to raise a whistleblowing concern, how the College will respond, and what protection and support are available.

Whistleblowing means reporting information about wrongdoing that is **in the public interest**. This policy is written in accordance with the Public Interest Disclosure Act 1998, which protects workers who make disclosures in the public interest

In law, this may amount to a **protected disclosure** if the person raising the concern reasonably believes the information shows relevant wrongdoing and uses an appropriate reporting route.

2. Who this policy applies to

This policy applies to:

- employees
- agency workers
- contractors and consultants
- governors / Corporation members
- volunteers
- casual workers
- people working on behalf of the College
- suppliers and service providers where relevant

3. What this policy covers

This policy covers serious concerns about wrongdoing, malpractice or risk affecting others or the wider public interest.

Examples include:

- a criminal offence
- breach of a legal duty
- fraud, bribery, corruption or misuse of funds
- financial irregularity
- a miscarriage of justice
- risks to health and safety
- safeguarding failures or abuse of students
- environmental damage
- serious breaches of policy or governance requirements
- deliberate concealment of any of the above
- other serious unethical conduct

4. What this policy does not cover

This policy is **not** normally for:

- personal employment grievances that affect only you
- complaints from students, parents or members of the public that should be handled through the Complaints Policy
- routine line management matters
- low-level professional conduct concerns that are better handled under the Staff Code of Conduct or safeguarding low-level concerns procedures

If you are not sure which policy applies, you can still raise the concern under this policy and the College will direct it to the right process.

5. Protection for whistleblowers

Anyone raising a concern under this policy will be treated seriously and fairly.

The College will not tolerate any retaliation because someone has raised a concern, helped with an investigation, or refused to take part in wrongdoing. This includes dismissal, disadvantage, bullying, exclusion, loss of opportunity, threats or harassment.

A person does **not** have to prove the allegation is true. They only need to have a **reasonable belief** that the information they are reporting is true, and that the concern is in the public interest. Current UK guidance uses this "reasonable belief" and "public interest" test.

If a concern is raised honestly and reasonably, no action will be taken against the person even if the concern is not upheld.

If someone knowingly makes a false allegation, acts maliciously, or raises a concern for personal gain in bad faith, that may result in disciplinary action.

6. Confidentiality and anonymity

The College will take all reasonable steps to protect the identity of anyone raising a concern.

However, confidentiality cannot be guaranteed in every case. There may be circumstances where the College needs to share information to investigate properly, to comply with the law, to protect others, or to ensure a fair process.

Concerns can be raised anonymously, but anonymous reports are usually harder to investigate. The College will still consider anonymous disclosures, taking account of:

- the seriousness of the concern
- the information provided
- whether the concern can be investigated without further contact

All information will be handled in line with the College's Data Protection Policy, privacy obligations and records retention arrangements.

7. Reporting routes

You can raise a whistleblowing concern with any of the following:

1. **Your line manager**
2. **HR Manager**
3. **Principal**
4. **Chair of Governors** if the concern involves the Principal or senior leaders
5. **Designated Safeguarding Lead (DSL)** if the concern is about the safety or welfare of a student
6. **Confidential reporting inbox**

If the concern relates to safeguarding or child protection, staff should report it immediately through safeguarding procedures as well.

8. How to raise a concern

You can raise a concern verbally or in writing. Written concerns are usually easier to follow up.
Please include, where possible:

- what happened
- who was involved
- when and where it happened
- whether the issue is still happening
- any evidence or documents
- whether you have already reported it elsewhere
- whether there is an immediate risk to anyone's safety

You do not need proof before raising a concern.

9. How the College will respond

The College will assess all concerns promptly and fairly.

9.1 Initial assessment

A suitable senior manager or appointed investigator will carry out an initial review to decide:

- whether the issue falls under this policy
- whether urgent action is needed
- whether the matter should be referred to another process, such as safeguarding, disciplinary, grievance, fraud, audit, police or a regulator
- who should investigate

9.2 Acknowledgement

The College will normally acknowledge receipt of the concern within **10 working days**. The acknowledgement will usually confirm:

- that the concern has been received
- who is handling it
- the next steps
- whether initial enquiries have begun
- what support is available
- whether the matter will be investigated further

9.3 Investigation

Where an investigation is needed, the College will appoint someone with appropriate independence and authority. In some cases, an external investigator may be appointed.

The investigator may:

- speak to the person raising the concern
- speak to witnesses
- review documents, emails, systems or records
- liaise with HR, safeguarding, governors, auditors, legal advisers, regulators or the police as needed

9.4 Timescales

The College will aim to:

- acknowledge the concern within 10 working days
- provide an initial update within 20 working days where possible
- keep the whistleblower informed of progress where it is lawful and appropriate
- explain if the matter will take longer than expected

9.5 Outcome

Where possible, and subject to confidentiality and legal restrictions, the College will tell the whistleblower whether:

- the concern was investigated
- the investigation is complete
- the concern was upheld in whole or in part
- action has been or will be taken

10. Support for the person raising the concern

Raising a whistleblowing concern can be difficult. The College will offer appropriate support, which may include:

- a named contact person
- access to HR support
- access to wellbeing or counselling support / Employee Assistance Programme if available
- the right to be accompanied at meetings by a trade union representative or workplace colleague/friend, as already allowed in your current policy
- practical support if the person is asked to give evidence

11. Governance, oversight and monitoring

The **Principal** has overall responsibility for the effectiveness of this policy, unless the concern relates to the Principal, in which case responsibility passes to the **Chair of Governors.**

The College will keep a secure central record of concerns raised, actions taken and outcomes.

Any whistleblowing cases will be reported to Audit Committee so that the College can identify patterns, improve controls and strengthen safeguarding and compliance.

12. Data handling and record keeping

Records of whistleblowing concerns will be:

- kept securely
- shared only where necessary
- retained in line with the College's retention schedule and data protection requirements
- reviewed for themes, lessons learned and risk management

Where appropriate, records will be kept separately from routine personnel/HR files in order to protect confidentiality as far as possible.

13. Raising concerns externally

The College hopes concerns can usually be resolved internally. However, if this is not appropriate, or if the concern is not addressed properly, a disclosure may be made to an appropriate external body.

Depending on the issue, this may include:

- the police
- external auditors
- safeguarding authorities / the LADO
- the Department for Education for academies and post-16 providers
- a relevant regulator or prescribed body
- a legal adviser
- a trade union
- NSPCC whistleblowing helpline: 0800 028 0285.

Government guidance says workers may make disclosures to their employer, a legal adviser or a prescribed person/body. Full details are contained in the links below:

- GOV.UK list of prescribed people and bodies [gov.uk]
- Department for Education: blowing the whistle about an academy or post-16 provider [gov.uk]

14. Training and awareness

The College will make sure staff know:

- what whistleblowing is
- what concerns should be raised
- how to raise them
- what protection is available
- where to go for safeguarding concerns
- where to go if the concern involves a senior leader

15. Review

This policy will be reviewed every three years, or earlier if there is a change in law, guidance or College practice.

Whistleblowing – Quick Guide for Staff

What is whistleblowing?
Whistleblowing means **raising a serious concern about wrongdoing** that affects others or the wider public.
You should speak up if something feels wrong — even if you're not 100% sure.

What should you report?
You can raise concerns about things like:

- Illegal activity (fraud, corruption, misuse of funds)
- Safeguarding risks or harm to students
- Health and safety dangers
- Serious breaches of policy or professional standards
- Abuse of power or unethical behaviour
- A cover-up of any of the above

👉 If it's about **your own employment issue**, use the **Grievance Policy** instead.
👉 If it's about **student safety**, also report via **Safeguarding (DSL)** immediately.

You will be protected

- You do **not** need proof — just a **reasonable belief**
- You can raise concerns **in confidence**
- The College will not tolerate:
    - bullying
    - harassment
    - disadvantage

✅ If you speak up in good faith, you will **not be penalised**

How to raise a concern
You can speak to:

1. Your **line manager**
2. **HR**
3. **Principal**
4. **Chair of Governors** (if concern is about senior leaders)
5. **DSL** (for safeguarding concerns)

Or use: whistleblowing@bhasvic.ac.uk
You can also raise concerns **anonymously** (but this can make investigation harder).

What to include
Tell us:

- what happened
- who was involved
- when and where
- whether it's ongoing
- any supporting information

What happens next

- ✅ We will acknowledge your concern within **10 working days**
- ✅ We will assess and investigate where needed
- ✅ You will be updated where possible
- ✅ We will take action if concerns are upheld

If you don't feel able to raise it internally
You can report to:

- relevant regulators (e.g. DfE, Ofsted)
- the police
- professional bodies
- **NSPCC Whistleblowing Helpline: 0800 028 0285**

Our commitment
We want a culture of:

➡️ **High challenge, low threat**
➡️ Speaking up early
➡️ Doing the right thing

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Related documents: Safeguarding and Child Protection Policy, Complaints Policy, Grievance Policy, Staff Code of Conduct, Anti-Fraud and Irregularity Policy, Disciplinary Procedures, Data Protection Policy, Health and Safety Policy. This reflects the way your current policy cross-refers to related documents.