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Gloucestershire College

Quality Controlled Document

Policy: **Whistleblowing Policy**

Date: **November 2025**

Approved by: **Head of Governance/Director of People, Facilities and Infrastructure**

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1 PURPOSE AND SCOPE

1.1 All colleges face the risk of things going wrong or of unknowingly harboring malpractice. We take malpractice very seriously and are committed to conducting our institution with honesty and integrity and we expect all staff to maintain high standards too. We encourage open communication from all those who work for us and we want everyone to feel secure about raising concerns.

1.2 All staff have protection under whistleblowing laws if they raise concerns in the correct way. This policy is designed to give staff that opportunity and protection. It does not matter if an individual who raises a concern is mistaken about it - staff do not have to prove anything about the allegation they are making but they must reasonably believe that the disclosure is made in the public interest and that the information they have tends to show some malpractice.

1.3 This policy applies to all our employees, officers, consultants, contractors and to other workers including agency workers, casual workers, volunteers, interns and home workers.

1.4 This policy does not form part of any contract of employment, and we may amend it at any time.

2 WHEN TO USE THIS POLICY

2.1 There is a difference between whistleblowing and raising a grievance:

2.1.1 whistleblowing is where an individual has a concern about a danger or illegality that has a public interest aspect to it, e.g., because it threatens students, third parties or the public generally; but

2.1.2 a grievance is a complaint that generally relates to an individual's own employment position or personal circumstances at work.

2.2 This policy does not set out the procedure that applies to general grievances. If you have a complaint about your own personal circumstances, then you should use our Grievance Procedure in the first instance.

3 MALPRACTICE COVERED BY THIS POLICY

3.1 Whistleblowing is the reporting of suspected malpractice, wrongdoing or dangers in relation to the activities the college undertakes. The kinds of malpractice covered by this policy include:

3.1.1 criminal offences, including those in relation to bribery and corruption and tax evasion facilitation;

3.1.2 miscarriages of justice;

3.1.3 danger to the health and safety of any individual;

3.1.4 damage to the environment;

3.1.5 breach of any legal or professional obligation, including those in relation to bribery and corruption and tax evasion facilitation;

3.1.6 deliberately concealing any of the above.

4 OUR GUARANTEE

4.1 We are committed to the principles set out in this policy. If you use this policy to raise a concern, we give you our assurance that you will not suffer any form of retribution or detrimental treatment. We will treat your concern seriously and act according to this policy.

4.2 If you ask for a matter to be treated in confidence, we will respect this request and, unless the law requires otherwise, will only make disclosures to third parties or other staff with your consent.

5 PROCEDURE FOR RAISING A CONCERN

5.1 If you are concerned about any form of malpractice covered by this policy, you should normally raise the issue with your immediate superior. If you feel you cannot tell your line manager, for whatever reason, you should raise the issue with the Director of People, Facilities and Infrastructure or the Head of Governance.

5.2 The Board of Governors has designated a member of the Board of Governors as a point of contact for those who wish to report concerns. The Designated Whistleblowing Governor can be contacted, in confidence, via the Head of Governance.

5.3 A concern can be raised by telephone, in person or in writing (including by email). It is preferable if it is made in writing. Although you are not expected to prove the truth of your concern beyond doubt or provide evidence, you will generally need to provide, as a minimum, details of the nature of the concern and why you believe it

to be true, and the background and history of the concern (giving relevant dates where possible).

5.4 You may wish to consider discussing your concern with a colleague or trade union supporter before raising it formally under this policy but remember that once you have raised a concern formally (alone or with a colleague), in the interests of everyone involved, this is a confidential process.

6 WHAT YOU SHOULD DO IF YOU HAVE CONCERNS ABOUT SAFEGUARDING PRACTICES WITHIN THE COLLEGE

6.1 You should feel able to raise concerns about poor or unsafe practice and potential failures in the College's safeguarding regime and know that such concerns will be taken seriously by the College.

6.2 This policy and procedure may be used to raise such concerns with the College, (in addition to raising any specific concern in accordance with the College's Safeguarding Policy). Nothing in this policy should prevent an individual directly contacting the Local Authority Designated Officer direct where appropriate to do so in accordance with Keeping Children Safe in Education.

6.3 In addition, the NSPCC whistleblowing helpline is available for workers who do not feel able to raise concerns regarding child protection failures internally. You can call 0800 028 0285 or email: help@nspcc.org.uk.

7 RESPONDING TO CONCERNS RAISED

7.1 We are committed to ensuring that all disclosures raised will be dealt with appropriately, consistently, fairly and professionally. We will arrange a meeting as soon possible to discuss the concern raised. You may bring a colleague or trade union supporter to any meeting that takes place. The companion must respect the confidentiality of the disclosure and any subsequent investigation. We may ask you for further information about the concern raised, either at this meeting or at a later stage.

7.2 After the meeting, we will decide how to respond. Usually, this will involve making internal enquiries first, but it may be necessary to carry out an investigation at a later stage which may be formal or informal depending on the nature of the concern raised. External investigators may be brought in where necessary. We will endeavour to complete investigations within a reasonable time.

7.3 We will keep you informed of the progress of the investigation carried out and when it is completed and give you an indication of timings for any actions or next steps that we will take, but we cannot inform you of any matters which would infringe any duty of confidentiality owed to others.

8 CONFIDENTIALITY

8.1 All concerns raised will be treated in confidence and every effort will be made not to reveal your identity if that is your wish. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of a disclosure without your help, so you may be asked to come forward as a witness. If you agree to this, you will be offered advice and support.

8.2 We hope that all staff will feel able to voice their concerns openly under this policy. Although a concern may be raised anonymously, we encourage you give your name when reporting your concern whenever possible. If this is not done, it will be much more difficult for us to protect your position or to give feedback on the outcome of investigations. Concerns that are expressed completely anonymously are also much less powerful and are difficult to investigate.

9 RAISING YOUR CONCERN EXTERNALLY (EXCEPTIONAL CASES)

9.1 The main purpose of this policy is to give all our staff the opportunity and protection they need to raise concerns internally. We would expect that, in almost all cases, raising concerns internally would be the most appropriate course of action.

9.2 If, for whatever reason, you feel you cannot raise your concerns internally and you reasonably believe the information and any allegations are substantially true, the law recognises that it may be appropriate for you to raise the matter with another prescribed person, such as a regulator (e.g., Ofsted/Department for Education) or professional body or an MP. A list of the relevant prescribed people and bodies for this purpose and the areas for which they are responsible is available from Protect (formerly known as Public Concern at Work) (see **Clause 10**), Further information and contacts, below) and on the GOV.UK website at:

https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2

9.3 We strongly encourage any individual to seek appropriate advice before reporting a concern to anyone external. Protect (formerly known as Public Concern at Work) is a leading independent charity whose main objectives are to promote compliance with the law and good practice in the public, private and voluntary sectors. They are a source of further information and advice and operate a confidential helpline. See **Clause 10**, Further information and contacts, below.

10 PROTECTION AND SUPPORT FOR THOSE RAISING CONCERNS

10.1 We are committed to good practice and high standards and to being supportive to staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

10.2 Any individual raising a genuine concern must not suffer any detriment as a result of doing so. If you believe that you have suffered such treatment, you should inform the Director of People, Facilities and Infrastructure or the Head of Governance immediately. If the matter is not dealt with to your satisfaction, you should raise it formally using our Grievance Procedure.

10.3 No member of staff must threaten or retaliate against an individual who has raised a concern, and we will not tolerate any such harassment or victimisation. Any person involved in such conduct may be subject to disciplinary action and, in some cases, will be liable to a claim for compensation brought against them personally.

10.4 To ensure the protection of all our staff, those who raise a concern frivolously, maliciously and/or for personal gain and/or make an allegation they do not reasonably believe to be true and/or made in the public interest will also be liable to disciplinary action.

10.5 The College recognises that the circumstances relating to the disclosure and any potential resultant actions may mean employees involved in the process may require additional support. The Colleges Employee Assistance Programme is available to all employees and details can be accessed via the College's Employee Assistance Programme from Health Assured. Any requests for additional support should be sent to the Director of People, Facilities and Infrastructure who will ensure appropriate options are signposted. Any such requests will be treated in confidence.

11 ACCOUNTABILITY

11.1 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 Board of Governors' Audit Committee as appropriate and on at least an annual basis. Records will be kept in accordance with the College's Retention Policy.

12 FURTHER INFORMATION AND CONTACTS

12.1 If you have any queries about the application of this policy, please contact the Director of People, Facilities and Infrastructure or the Head of Governance in the first instance.

12.2 Further information is available on the GOV.UK website at: https://www.gov.uk/whistleblowing

12.3 Relevant regulators may include:

Name of regulator	Contact details
Her Majesty's Chief Inspector of Education, Children's Services and Skills	The Chief Inspector Ofsted Piccadilly Gate Store Street

	Manchester M1 2WD Tel: 0300 123 3155 Email: whistleblowing@ofsted.gov.uk
Secretary of State for Education	Ministerial and Public Communications Division Department for Education Piccadilly Gate Store Street Manchester M1 2WD Tel: 0370 000 2288 Website: www.gov.uk/contact-dfe
The Health and Safety Executive	Tel: 0300 003 1647 Online form: www.hse.gov.uk/contact/concerns.htm

12.4 Protect (formerly known as Public Concern at Work) is a source of further information and advice:

The Green House
244-254 Cambridge Heath Road
London E2 9DA
https://protect-advice.org.uk
Whistleblowing Advice Line: 020 3117 2520

12.5 You can also contact Citizens' Advice or ACAS for guidance on whistleblowing and grievance.

https://www.acas.org.uk/
Helpline: 0300 123 1100
https://www.citizensadvice.org.uk/

RELATED POLICIES

Related Policies and Procedures
Financial Regulations
Anti-Fraud Policy and Strategy
Anti-Bribery Policy
Receipt of Gifts and Hospitality Policy

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Disciplinary Policy and Procedure
Grievance Procedure
Safeguarding Policy

Approved by: Audit Committee
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