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Staff member responsible for update	Katie Jack

Amendment History

Version	Revision Summary	Date Approved	Author

Whistleblowing Policy

1. Introduction

1.1 Christ the Redeemer College ("the College") is committed to conducting its affairs with the highest standards of integrity, openness, probity, and accountability. These principles are central to the College's governance framework and underpin its responsibility to students, staff, regulators, partners, and the wider public.

1.2 Whilst there is no single statutory definition of 'whistleblowing' within UK law, the term is commonly used to describe the confidential raising of concerns about wrongdoing within an organisation. In legal terms, such disclosures are referred to as 'protected disclosures' under the Public Interest Disclosure Act 1998 (PIDA), where specific conditions are met, including that the disclosure is made in the public interest.

1.3 Staff may be the first to realise that there may be something seriously wrong within the College. However, concerns may not be raised due to fears of disloyalty, harassment, or victimisation. The College therefore recognises the importance of creating an environment in which individuals feel confident and supported to raise concerns at an early stage.

1.4 In line with its commitment to openness and accountability, the Corporation (being the College's governing body) encourages staff and others with serious concerns about any aspect of the College's work to come forward. This Policy makes it clear that such concerns can be raised without fear of reprisals and will be addressed appropriately and, where necessary, on a confidential basis.

1.5 This Policy sets out the framework for raising concerns that are in the public interest and ensures that such disclosures are handled appropriately, proportionately, and in accordance with legal requirements.

1.6 The College is committed to:

- Encouraging individuals to raise genuine concerns in good faith.
- Ensuring that concerns are taken seriously and investigated appropriately.
- Protecting those who make disclosures from detriment or victimisation.
- Maintaining appropriate confidentiality throughout the process.

1.7 This Policy forms part of the College's governance and risk management framework and is subject to oversight by the Board of Governors and its relevant committees, including the Audit and Risk Committee.

1.8 The Policy applies to all staff and workers as defined under the Public Interest Disclosure Act 1998, including employees, agency workers, and those undertaking work experience or training.

1.9 In keeping with the spirit and letter of the law, the Policy is intended to encompass all individuals with a working relationship with the College, including contractors and, where appropriate, third parties.

1.10 It is recognised that students may also raise matters of public interest. However, this Policy will not normally apply to individual student complaints, which are addressed through the Student Complaints Procedures, unless there is a wider public interest concern.

2. Definitions

2.1 For the purposes of this Policy, the following definitions apply:

Whistleblowing / Public Interest Disclosure

2.2 Whistleblowing is the disclosure of information which, in the reasonable belief of the individual making the disclosure, indicates wrongdoing or malpractice that is in the public interest. This means that the concern must relate to matters that affect others beyond the individual personally.

Worker

2.3 For the purposes of legal protection under the Public Interest Disclosure Act 1998 (PIDA), a "worker" includes employees, agency workers, contractors, and others who perform work or services for the College.

Malpractice / Impropriety

2.4 This includes, but is not limited to, criminal activity, failure to comply with legal obligations, breaches of regulatory requirements, risks to health and safety, fraud, corruption, academic misconduct, or actions which fall below accepted standards of governance and integrity.

Detriment / Victimisation

2.5 Any disadvantage suffered as a result of making a disclosure under this Policy, including dismissal, disciplinary action, denial of opportunities, or other unfavourable treatment.

Confidentiality

2.6 The College will, as far as reasonably practicable, protect the identity of the individual making a disclosure, subject to legal and procedural requirements.

3. Scope

3.1 This Policy applies to all individuals associated with the College, including:

- Employees (permanent and temporary).
- Agency workers and contractors.
- Consultants and third-party service providers.
- Members of the Board of Governors.
- Volunteers and individuals undertaking work experience.
- Students (where the concern relates to matters of public interest, rather than personal complaints).

3.2 Students, including student representatives, may raise concerns under this Policy where those concerns relate to matters of wider public interest, rather than individual complaints.

3.3 For individuals who fall within the legal definition of a "worker", protection is afforded under the Public Interest Disclosure Act 1998. Other individuals are encouraged to raise concerns under this Policy, and the College will treat such disclosures seriously, although statutory protection may not apply.

3.4 This Policy is distinct from other College procedures. It is not intended to be used for:

- Personal grievances relating to employment (which should be addressed through the Grievance Policy).
- Student complaints or academic appeals (which should be addressed through the relevant student procedures).
- Routine operational disagreements or dissatisfaction with management decisions.

3.5 Where a concern falls more appropriately within another procedure, the College will advise the individual accordingly.

4. Purpose and Objectives

4.1 The purpose of this Policy is to provide a clear, accessible, and robust framework for raising and addressing concerns of wrongdoing in a manner that supports the College's commitment to ethical conduct, transparency, and accountability.

4.2 This Policy aims to:

- Provide a channel and process within which individuals can raise genuine and legitimate concerns.
- Deter serious malpractice and avoid crisis management.
- Enable the early identification and resolution of risks, misconduct, or malpractice.
- Promote accountability throughout the college and support high standards of governance.

4.3 The Policy supports compliance with the Public Interest Disclosure Act 1998 and relevant regulatory expectations and strengthens institutional governance by providing clear routes for escalation, independent oversight, and effective monitoring of concerns.

4.4 There are existing procedures in place to enable staff to raise concerns relating to their own employment. This Policy is intended to cover concerns which fall outside the scope of other procedures, policies, and codes of conduct. It is not intended to replace those procedures but to complement them where matters are of wider public interest.

4.5 Through the effective operation of this Policy, the College seeks to deter wrongdoing, promote high standards of conduct, and maintain the trust and confidence of its stakeholders.

5. Types of Concern

5.1 The concerns which may commonly give rise to whistleblowing are those which an individual reasonably believes to be in the public interest and may include matters which:

- Unlawful.
- Are against the College's or corporation's policies or fall below established standards or practice.
- Amount to improper conduct.

5.2 Types of concern considered under this Policy may include, but are not limited to:

- Conduct which is an offence or breach of law.
- Failure to comply with a legal obligation.
- Health and safety risks, including risks to the public, students, or staff.
- Unauthorised use of public funds.
- Acts of bribery or unethical incentives.

- Possible fraud or corruption.
- Sexual, physical or verbal harassment of individuals.
- Actions which are unprofessional, inappropriate, or conflict with a general understanding of what is right or wrong.

5.3 The above examples are not exhaustive but are provided to offer guidance on the types of matters that may fall within the scope of this Policy.

6. Safeguards

Harassment or Victimisation

6.1 The College recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for malpractice.

6.2 The College will not tolerate harassment or victimisation and will take appropriate action to protect individuals who raise a concern in good faith. No individual raising a concern in accordance with this Policy will suffer any detriment as a result, and any act of retaliation will be treated as a disciplinary matter.

6.3 Where an individual is already subject to other procedures, such as disciplinary or redundancy processes, those procedures will not normally be halted as a result of a whistleblowing concern. However, where the concern relates directly to the matter under consideration, the relevant procedure may be reviewed or paused pending the outcome of an investigation.

Confidentiality

6.4 The College will do its best to protect an individual's identity where they do not wish their name to be disclosed.

6.5 However, it must be recognised that the investigation process may reveal the source of the information, and a statement by the individual may be required as part of the evidence.

Anonymous Allegations

6.6 This Policy encourages individuals to put their name to an allegation wherever possible, as concerns expressed anonymously are more difficult to investigate.

6.7 Nevertheless, anonymous concerns will be considered at the discretion of the College, taking into account:

- The seriousness of the issues raised.
- The credibility of the concern.

- The likelihood of confirming the allegation from attributable sources.

Untrue Allegations

6.8 If an individual makes an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against them.

6.9 However, if an individual makes malicious or vexatious allegations, disciplinary action may be taken.

6.10 Protection under the Public Interest Disclosure Act 1998 applies where the individual reasonably believes that their disclosure tends to show one or more of the following:

- That a criminal offence has been committed, is being committed, or is likely to be committed.
- That a person has failed, is failing, or is likely to fail to comply with a legal obligation.
- That a miscarriage of justice has occurred, is occurring, or is likely to occur.
- That the health and safety of any individual has been, is being, or is likely to be endangered.
- That information relating to any of the above has been, is being, or is likely to be deliberately concealed.

7. How to Raise a Concern

7.1 As a first step, individuals should normally raise concerns with their immediate manager. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice.

7.2 Where the concern involves line management, or where the individual does not feel able to raise the matter through their immediate manager, they may make a direct approach to the Rector, Registrar, or Director of Operations, or such other senior officer as may be designated by the College to receive whistleblowing concerns.

7.3 Concerns are preferably raised in writing. Individuals are invited to set out the background and history of the concern, giving names, dates and places where possible, and the reason why they are particularly concerned about the situation.

7.4 Where an individual does not feel able to put their concern in writing, they may raise the matter verbally, either by telephone or in a meeting with an appropriate member of staff.

7.5 The earlier a concern is expressed, the easier it is to take appropriate action.

7.6 Although an individual is not expected to prove the truth of an allegation, they will need to demonstrate that there are reasonable grounds for their concern and that the disclosure is made in the public interest.

7.7 Individuals may invite a trade union representative, professional body, or other appropriate person to raise a concern on their behalf or to provide support during the process.

8. How the College will Respond

8.1 The action taken by the College will depend on the nature and seriousness of the concern. The matters raised may:

- Be referred to the Corporation.
- Be investigated internally.
- Be referred to the Internal Auditor.
- Be referred to the Police.
- Be referred to the External Auditor.
- Form the subject of an independent inquiry.
- Be referred to any other appropriate external professional or regulatory body.

8.2 In order to protect individuals and the College, initial enquiries will be made to determine whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations which fall within the scope of other policies (for example safeguarding, discrimination, or student complaints) will normally be referred for consideration under those procedures.

8.3 Some concerns may be resolved by agreed action without the need for a formal investigation, depending on the circumstances and in consultation with the individual raising the concern where appropriate.

8.4 Within ten working days of a concern being received, the College will write to the individual:

- Acknowledging that the concern has been received.
- Indicating how it proposes to deal with the matter.
- Giving an estimate of how long it will take to provide a final response.
- Indicating whether any initial enquiries have been made. and
- Indicating whether further investigations will take place and, if not, why not.

8.5 The amount of contact between those considering the issues and the individual raising the concern will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided. Where necessary, further information will be sought.

8.6 When any meeting is arranged, individuals have the right, if desired, to be accompanied by a trade union representative, professional association representative, or a colleague of the College who is not involved in the area of work to which the concern relates.

8.7 The College will take steps to minimise any difficulties which may be experienced as a result of raising a concern. For example, if an individual is required to give evidence in criminal or disciplinary proceedings, the College will provide appropriate advice and support.

8.8 The College accepts that individuals need to be assured that the matter has been properly addressed. Accordingly, subject to legal constraints and confidentiality considerations, they will be informed of the outcome of any investigation.

8.9 A record of concerns raised, and the outcomes will be maintained in a confidential manner and reported, where appropriate, to senior management and the relevant governing bodies as part of the College's oversight and assurance processes.

9. How the Matter can be Taken Further

9.1 This Policy is intended to provide individuals with an avenue to raise concerns within the College.

9.2 Where an individual is dissatisfied with the outcome of an investigation, they may request a review of the decision. Such a review will consider whether the concern has been addressed appropriately, fairly, and in accordance with this Policy.

9.3 A request for review should be made in writing within a reasonable timeframe and will be considered by an appropriate senior officer not previously involved in the matter, or, where necessary, by the Board of Governors or the Audit and Risk Committee

9.4 If an individual is not satisfied with the outcome of the investigation and reasonably believes that the concern has not been adequately addressed, they may consider raising the matter outside the College.

9.5 Possible external contact points may include:

- The College's external auditors.

- Relevant professional or regulatory bodies.
- A solicitor.
- The Police.
- Any other prescribed body appropriate to the nature of the concern.

9.6 Individuals considering raising a matter externally are strongly encouraged to seek appropriate advice before doing so, to ensure that any disclosure is made in accordance with legal requirements and does not breach obligations of confidentiality.

9.7 Nothing in this Policy is intended to prevent an individual from making a protected disclosure in accordance with the provisions of the Public Interest Disclosure Act 1998.

10. Responsibility Officer

10.1 The Rector has overall responsibility for the maintenance and operation of this Policy and for ensuring that appropriate arrangements are in place for the effective receipt, investigation, and resolution of concerns raised under this Policy.

10.2 The Rector may designate an appropriate senior officer to act as the point of contact for the receipt and coordination of whistleblowing concerns and to ensure that such concerns are handled consistently and appropriately.

10.3 The Rector will maintain a record of concerns raised and the outcomes (in a form which does not compromise confidentiality) and will report, as appropriate, to the Board of Governors and relevant committees, including the Audit and Risk Committee, as part of the College's governance and assurance framework.

10.4 Where an individual has a concern relating to the Rector or Registrar, they may raise this directly with the Board of Governors through the Chair of the Board, who will determine the appropriate course of action, including referral to the Chair of the Audit and Risk Committee where necessary.

11. Monitoring and Review

11.1 This Policy has been approved with reference to the Public Interest Disclosure Act 1998 (PIDA).

11.2 The Policy will be subject to periodic review to ensure that it remains compliant with current legislation, regulatory expectations, and best practice within the higher education sector.

11.3 The Senior Management Team shall be responsible for oversight of the implementation of this Policy, with formal approval and review undertaken by the appropriate governing body, including the Audit and Risk Committee.

11.4 Any material changes to this Policy will be recorded within the Document Review Tracker and approved in accordance with the College's policy governance framework.

Appendix 1: Whistleblowing Process Overview

1. Identifying a Concern
An individual identifies a potential case of wrongdoing, malpractice, or risk to the College and considers whether the matter is in the public interest.

2. Raising a Concern
The concern is raised through the appropriate channel, normally with a line manager, or alternatively with a senior officer or designated contact where appropriate.

3. Acknowledgement
The College acknowledges receipt of the concern and determines how it will be addressed.

4. Initial Assessment
An initial assessment is undertaken to determine whether the concern falls within the scope of the whistleblower policy and whether a formal investigation is required.

5. Investigation
Where appropriate, a formal investigation is conducted, either internally or by an independent person, depending on the nature of the concern.

6. Outcome and Action
The findings of the investigation are reviewed and appropriate action is taken.

7. Feedback
Where possible and appropriate, feedback is provided to the individual who raised the concern, subject to confidentiality constraints.

Appendix 2: Whistleblowing Procedure decision tree (text version)

1. **Identify the concern.** An individual identifies a concern about wrongdoing, malpractice, or risk within the College.

    a. Decision: Does the individual reasonably believe that malpractice has occurred, is occurring, or is likely to occur?

        NO = No further action is taken under this Policy.
        YES = Proceed to Step 2.

2. **Determine whether the concern qualifies.** The individual considers whether the concern meets the definition of a qualifying disclosure under this Policy.

    a. Decision: Is this a qualifying disclosure?

        NO = The concern should be raised under an alternative relevant College policy (e.g. Grievance or Complaints Policy).
        YES = Proceed to Step 3.

3. **Apply the public interest test.** The individual considers whether the concern is in the public interest and not solely a personal matter.

    a. Decision: Is the concern in the public interest?

        NO = The matter should be raised under another relevant procedure.
        YES = Proceed to Step 4.

4. **Raise the concern.** The individual raises the concern through an appropriate reporting channel, normally via line management or an alternative senior officer, or, where appropriate, via the Chair of the Board of Governors or Audit and Risk Committee.

5. **Acknowledgement and initial response.** The College acknowledges receipt of the concern (where the individual is known) and undertakes an initial assessment to determine how the matter will be addressed.

6. **Initial assessment.** The designated officer determines whether a formal investigation is required and, where appropriate, appoints an internal or external investigating officer.

7. **Investigation.** The investigating officer undertakes the investigation and reports findings to the designated officer.

8. **Outcome and action.** The designated officer reviews the findings and determines appropriate action.

    a. If the concern is upheld:
        i. Appropriate corrective action is taken;
        ii. The matter may be referred to an external or statutory body where necessary;
        iii. The matter is reported through governance structures, including the Audit and Risk Committee.

    b. If the concern is not upheld:
        i. The individual is informed of the outcome (where appropriate), subject to confidentiality considerations.

    c. If no action is taken:
        i. The individual may escalate the concern in accordance with the whistleblower policy.

9. **Feedback.** Where possible and appropriate, feedback is provided to the individual who raised the concern, subject to confidentiality constraints.