Whistleblowing and Public Interest Disclosure Policy

Field	Details
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Responsible Committee	Executive Leadership Team (ELT)
Approved by and date	Executive Leadership Team - January 2026
External reference points	OfS Condition E7, E8 and E9 Bribery Act 2010 Fraud Act 2006 Public Interest Disclosure Act 1998 Employment Rights Act 1996 (Part IVA) UK GDPR and Data Protection Act 2018 ACAS Guidance on Whistleblowing at Work (last reviewed October 2024)
Linked policies	GA 3.5 Anti-Fraud, Bribery and Corruption Policy; GA 3.4 Conflicts of Interest Policy
Audience	Staff Students Governors and Committee Members Contractors, Suppliers and Agents External Partners and Stakeholders

Contents

1. Purpose

UK College of Business and Computing (UKCBC) is committed to maintaining effective governance, safeguarding students, protecting public funds and upholding public trust.

Whistleblowing enables individuals to report wrongdoing that affects others and is in the public interest. Legally this is known as making a disclosure in the public interest.

This policy forms part of the College's governance framework required to enable effective governance in practice under Condition E7.

It supports comprehensive arrangements to detect, prevent and stop fraud and misuse of public funds under Condition E8.

It also supports oversight of key individuals and fit and proper assurance under Condition E9.

2. Scope

2.1 Who may raise a concern

This policy applies to:

- Staff
- Workers and agency staff
- Students
- Governors and committee members
- Contractors and suppliers
- Recruitment agents and delivery partners

Although statutory protection primarily applies to workers and employees, UKCBC permits students and other stakeholders to raise concerns under this policy as part of its governance arrangements.

2.2 Matters within scope

Whistleblowing concerns must relate to wrongdoing that is in the public interest and may include:

- A criminal offence
- Breach of a legal obligation
- Miscarriage of justice
- Health and safety risks
- Damage to the environment
- Fraud, bribery or corruption
- Misuse of public funds or student finance
- Serious governance failures
- Breach of regulatory conditions
- Concealment of any of the above

A concern may relate to past, present or anticipated conduct, including conduct overseas.

A personal grievance that affects only the individual and is not in the public interest is unlikely to fall within whistleblowing law and should normally be addressed through the grievance procedure.

3. Legal Framework and Protection

3.1 Protected disclosures

Under the Public Interest Disclosure Act 1998, workers are protected if they make a qualifying disclosure and reasonably believe:

The disclosure falls within one of the recognised categories of wrongdoing
The disclosure is in the public interest

Public interest means the concern affects others, such as students, staff, public funds or the wider community.

3.2 Protection from detriment and dismissal

Whistleblowers are legally protected from:

- Unfair dismissal
- Detriment

Detriment includes being treated worse than before or having a situation made worse because a disclosure was made. This may include bullying, harassment, denial of opportunities or unjustified reduction in responsibilities.

UKCBC will not tolerate victimisation or retaliation.

3.3 Non-disclosure agreements

No confidentiality clause or non-disclosure agreement can prevent an individual from making a protected disclosure.

4. Governance Responsibilities

4.1 Board of Governors

The Board ensures that whistleblowing arrangements operate effectively in practice as part of the College's governance documentation under Condition E7.

The Board oversees assurance relating to:

- Delivery of the business plan
- Fraud and public funds integrity
- Protection of students
- Public trust and confidence

The Board retains oversight of fit and proper considerations under Condition E9.

4.2 Audit and Risk Committee

The Audit and Risk Committee provides independent oversight of whistleblowing arrangements and fraud prevention controls.

The Committee will:

- Receive anonymised annual whistleblowing reports
- Monitor fraud and public funds risks under Condition E8
- Review systemic governance issues
- Commission independent investigation where appropriate

4.3 Managers and Senior Leaders

Managers must:

- Treat disclosures seriously
- Follow this policy consistently
- Maintain confidentiality
- Ensure whistleblowers do not suffer detriment
- Escalate concerns appropriately

Managers and relevant staff will receive training on whistleblowing procedures.

Failure to respond appropriately may expose the College to legal and regulatory risk, including potential vicarious liability where retaliation occurs.

5. Raising a Concern

5.1 Internal reporting routes

Concerns may be raised with:

- Line Manager or Programme Leader
- Director of Governance, Quality and Student Success
- Chief Executive Officer
- Chair of the Audit and Risk Committee
- Chair of the Board of Governors

Concerns involving senior leadership may be directed to the Chair of the Board.

5.2 Anonymous disclosures

The College provides an anonymous reporting mechanism via its website.

Anonymous concerns will be considered, although investigation may be limited where insufficient information is available.

5.3 External disclosures

Individuals may report concerns to prescribed regulators where appropriate, including the Office for Students.

Independent advice may be sought from Protect.

6. Responding to a Disclosure

6.1 Handling principles

The College will:

- Handle disclosures fairly and consistently
- Keep the identity of the whistleblower confidential so far as reasonably practicable
- Listen carefully to the concern
- Assess available evidence
- Reassure the whistleblower that retaliation will not be tolerated
- Keep the whistleblower informed of progress where appropriate
- Provide feedback following investigation

6.2 Grievance overlap

Where a grievance contains elements of whistleblowing, both procedures may need to operate.

If a concern is not considered whistleblowing, the individual will be informed and directed to the appropriate process.

7. Investigation

7.1 Initial assessment

- All disclosures will be acknowledged promptly.
- An initial assessment will determine:
- Whether the matter falls within scope
- Whether it is a qualifying disclosure
- The appropriate investigation route
- Whether independent investigation is required

7.2 Investigation standards

Investigations will:

- Be fair and proportionate
- Respect confidentiality
- Be completed without unreasonable delay
- Produce a documented outcome

Material concerns relating to fraud or public funds will be escalated to the Audit and Risk Committee.

8. Fraud and Public Funds Assurance

Whistleblowing is a key mechanism supporting the College's arrangements to detect, prevent and stop fraud and inappropriate use of public funds under Condition E8.

Concerns relating to financial impropriety, student finance misuse or grant funding irregularity will be prioritised. Lessons learned from disclosures will inform risk management and internal control improvement.

9. Monitoring and Review

9.1 Governance reporting

The Audit and Risk Committee will receive an annual anonymised report covering:

- Number and type of disclosures
- Fraud and financial risk themes
- Governance issues identified
- Actions taken
- Control improvements implemented

The Board will receive assurance through established governance reporting routes.

9.2 Review cycle

This policy will be reviewed at least every two years or earlier if regulatory change requires.

10. What This Means for You

If you reasonably believe that wrongdoing is occurring and it affects others or the public interest, you can raise it safely.

You will not be subjected to detriment for raising a genuine concern.

If your concern is personal and not in the public interest, you should use the grievance or complaints procedure instead.