

William
College

Whistleblowing Policy

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1. Introduction

William College is committed to upholding the highest standards of integrity, accountability, and transparency across all of its academic and professional activities. In accordance with its obligations under the Public Interest Disclosure Act 1998 (PIDA) and the principles of good governance, the College encourages individuals to report concerns about wrongdoing, malpractice, or risks to health, safety, or the law.

This policy provides a clear, secure, and supportive framework for reporting such concerns, also known as 'whistleblowing', in the public interest.

Examples of concerns that may be 'in the public interest' include systemic fraud, serious safety risks, or widespread malpractice affecting students, staff, or the wider academic community.

2. Purpose

The purpose of this policy is to:

- Create a culture of openness and accountability.
- Provide a safe and accessible process for reporting suspected wrongdoing.
- Ensure that all concerns are investigated fairly, promptly, and confidentially.
- Protect individuals who raise concerns — regardless of good faith — from victimisation or retaliation, in line with the Public Interest Disclosure Act 1998 (as amended).
- Support compliance with legal, regulatory, and ethical obligations, including those from:
 - Office for Students (OfS).
 - Department for Education (DfE).
 - Other applicable regulatory bodies.
- Reassure staff, students, and stakeholders that concerns will be treated seriously and acted upon.
- Ensure that individuals will not suffer academic or professional disadvantage as a result of raising a genuine concern.

3. Scope

This policy applies to:

- Employees (academic and professional, permanent, temporary, agency and contractors).
- Students.
- Members of the Governing Body.
- External stakeholders (e.g. suppliers, consultants, placement providers).

It covers concerns in the public interest, including:

- Criminal activity (e.g. fraud, bribery).
- Legal or regulatory breaches.
- Academic or research misconduct.
- Financial irregularities.
- Health and safety risks (including safeguarding).
- Discrimination, harassment, or bullying.
- Environmental harm.
- Attempts to conceal wrongdoing.

Urgent safeguarding or Prevent concerns may override normal confidentiality arrangements.

Where a concern falls outside the scope of this policy, the individual will be redirected to the appropriate policy or procedure. For a concern to qualify as a protected disclosure, it must be ‘in the public interest’.

Examples include issues that affect students, staff, the wider community, or the integrity of the College, such as systemic fraud, serious safety risks, or widespread malpractice. Issues that relate solely to personal employment matters (e.g., interpersonal disputes, terms and conditions) should normally be raised through the Complains and Grievances Policy and Procedures.

4. Definitions

Term	Definition
Whistleblowing	The reporting of suspected wrongdoing or risk in the public interest
Protected Disclosure	A disclosure that meets the criteria under the Public Interest Disclosure Act 1998
Public Interest	Matters affecting others beyond personal interest, such as systemic wrongdoing, safety risks, or misconduct
Designated Whistleblowing Officer	The appointed individual responsible for receiving and managing whistleblowing disclosures

5. Policy Statement

William College is committed to:

- Upholding integrity, transparency, and accountability in all activities.
- Providing a secure and confidential framework for raising concerns.
- Ensuring disclosures are handled fairly, consistently, and promptly.
- Protecting whistleblowers from victimisation, harassment, or disadvantage.
- Encouraging individuals to raise concerns where there is a reasonable belief of wrongdoing.
- Maintaining confidentiality and respecting anonymity wherever possible.

Disclosures made under this policy may qualify as protected disclosures under the Public Interest Disclosure Act 1998 (PIDA). To qualify, disclosures must:

- Be made in the public interest.
- Concern a relevant failure or wrongdoing.

Under the Public Interest Disclosure Act 1998 (PIDA), a disclosure does not need to be made in ‘good faith’ to qualify for protection. However, lack of good faith may be taken into account by a tribunal when assessing compensation. The College encourages all disclosures to be made honestly and responsibly.

6. Responsibilities

Department/ Individual	Responsibilities
All Staff and Students	Raise concerns responsibly and, wherever possible, with honesty and integrity. Ensure concerns relate to the public interest.
Line Managers	Listen to concerns raised informally. Signpost staff appropriately and escalate concerns where they may meet the threshold for whistleblowing.

Designated Whistleblowing Officer (HR)	Act as the Designated Whistleblowing Officer responsible for receiving disclosures. Coordinate the triage process. Maintain the whistleblowing register. Ensure appropriate escalation and oversight of investigations. Receive appropriate training in whistleblowing handling, confidentiality and investigations. Does not act as the sole decision-maker in determining whether a formal investigation is required.
Quality and Governance Team	Track disclosures and outcomes. Report anonymised data to Senior Leadership management Team (SLMT), Executive Leadership team (ELT), and the Board of Governors.
Chief Executive Officer (CEO)	Support oversight of formal disclosures and participate in triage where required.
Chair of the Board of Governors	Act as the designated escalation point where a disclosure relates to the CEO. Assume oversight of triage and any subsequent investigation in such cases, independently of the CEO. Act as the final escalation point where both the Designated Whistleblowing Officer and CEO are implicated, or where no other appropriate escalation route is available.
Audit, Risk and Finance Committee	Monitor operational risks and escalate appropriately.

The whistleblowing process is managed by the Human Resources (HR) function to ensure consistency, confidentiality, and appropriate escalation.

To ensure impartiality, any disclosure involving the Designated Whistleblowing Officer, or any case where there may be a conflict of interest, will be automatically redirected to an alternative senior officer (normally the Chair of the Audit, Risk and Finance Committee).

7. Procedure

7.1 Raising a Concern

Where possible, individuals are encouraged to raise concerns informally with:

- Line Manager or Head of Division.
- For students: Lecturer or Wellbeing Team.

The informal route may enable concerns to be resolved quickly where appropriate; however, individuals are not required to raise concerns informally before using the formal whistleblowing process.

Formal concerns should be raised by completing the dedicated [Whistleblowing Microsoft Form](#).

The form is accessible via:

- The College website (public-facing page, no login required).
- The Staff Teams Channel.
- The Student Portal (Moodle).

Access via the public website is designed to preserve anonymity and does not require user authentication.

- The form is automatically marked and routed as a 'Whistleblowing Disclosure'.
- Submissions will be received by the Designated Whistleblowing Officer.

Alternative formats of reporting (e.g. emails or written submission) are available to ensure accessibility.

If the concern relates to the Designated Whistleblowing Officer, or where the individual considers it inappropriate to raise the matter through the standard reporting route, the concern should instead be submitted using the alternative reporting form available here: [Board Route: William College Whistleblowing Reporting Form – Fill out form](#)

. This route enables direct reporting to the Chair of the Board of Governors.

Where a disclosure relates to the CEO, concerns must be submitted via the alternative reporting form (available here: [Board Route: William College Whistleblowing Reporting Form – Fill out form](#)). In such cases, the Chair of the Board of Governors will assume responsibility for oversight of the triage and any subsequent investigation, independently of the CEO.

Individuals should provide as much relevant information as possible, including:

- A clear description of the issue.
- Why the concern is believed to be in the public interest.
- Any supporting background, dates, or evidence (if available).

Individuals do not need to provide proof of wrongdoing. They only need a reasonable belief that the information they are reporting indicates a relevant failure or risk under the Public Interest Disclosure Act 1998 (PIDA Section 43B(1)).

7.2 Anonymity and Confidentiality

Disclosures will be handled confidentially as far as reasonably possible. Individuals are encouraged to identify themselves in order to ensure full protection and to support a thorough and effective investigation; however, anonymous reports will be considered. It is recognised that anonymity may limit the College's ability to investigate the concern fully or to provide feedback on the outcome.

Access to the reporting process via the public-facing website is designed to support anonymity and does not require login credentials. Information relating to a disclosure will only be shared with individuals who have a legitimate need to know for the purpose of assessing or investigating the concern. All personal data will be handled in accordance with UK General Data Protection Regulation (GDPR) and the College's Data Protection Policy and will be stored securely.

7.3 Acknowledgement and Timescales

All disclosures will be acknowledged within 7 working days of receipt. An initial assessment will normally be completed within 20 working days of acknowledgement. Where appropriate, feedback on the outcome of the concern will be provided within 3 months of acknowledgement.

In some cases, it may not be possible to meet these timescales due to the complexity or sensitivity of the matter. Where this occurs, the individual will be informed, where possible, and provided with an update.

7.4 Initial Assessment Triage

All formal disclosures will undergo an initial triage process before any decision is made regarding further investigation. This process will normally be conducted by the Designated Whistleblowing Officer together with at least one additional senior member of staff.

The purpose of the triage process is to determine whether the concern falls within the scope of this policy, to assess the level of risk, seriousness, and urgency, and to decide whether a formal investigation is required. The process will also identify the most appropriate route for handling the concern, which may include referral to HR processes, safeguarding procedures, or external bodies where appropriate.

No single individual will have sole responsibility for determining whether a disclosure proceeds to formal investigation, in order to ensure fairness, transparency, and accountability.

7.5 Investigation Process

Where the initial assessment determines that an investigation is required, the College will appoint an impartial investigator with appropriate experience. The investigation will involve the gathering of relevant evidence, which may include documentation, interviews, and witness statements.

The individual(s) subject to the allegation will be given an opportunity to respond to the concerns raised. A written report will be produced at the conclusion of the investigation, setting out the findings and any recommended actions.

All investigations will be conducted in a fair, proportionate, and timely manner. Individuals involved in the investigation process will be required to declare any conflicts of interest at the outset. The whistleblower will be informed, where appropriate, of the outcome of the investigation, recognising that confidentiality and legal considerations may limit the level of detail that can be shared.

7.6 Possible Outcomes

Following the assessment or investigation of a concern, the College may determine that a range of outcomes is appropriate depending on the nature and seriousness of the issues identified. This may include the initiation of a formal internal investigation, referral to HR procedures, or escalation to an external authority such as a regulator or the police.

In some cases, it may be concluded that no further action is required. Where appropriate, steps may also be taken to improve policies, procedures, or controls to prevent recurrence.

8. Training and Communication

The College will ensure that this policy is communicated effectively to staff and students.

Relevant staff involved in handling whistleblowing concerns will receive appropriate training to ensure they understand their responsibilities and are able to manage disclosures sensitively, confidentially, and in accordance with this policy.

9. Policy Review

This policy is reviewed by the Executive Leadership Team every year, or earlier in response to changes in the regulatory framework. Any amendments require the approval of the Board of Governors.

10. Related Policies and Documents

- Complaints and Grievances Policy and Procedures.
- Safeguarding and Prevent Policy.
- Data Protection Policy.
- Equality, Diversity and Inclusion Policy.
- Code of Practice on Academic Freedom and Freedom of Speech.