



**Buckinghamshire
College Group**

Whistleblowing Statement of Policy & Procedure 2025-28

Author: Executive Director People and Purpose
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Policy Authorised by: Executive / Trade Unions / Corporation

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Statement of Policy & Procedure – Whistleblowing

1. Purpose

Buckinghamshire College Group is committed to the highest standards of openness, integrity, and accountability. This policy provides a framework for staff and stakeholders to raise concerns about wrongdoing in the public interest, in line with the Public Interest Disclosure Act 1998 (PIDA) and updates from UK legislation as of 2025. The purpose of this policy is to ensure individuals feel safe and supported when reporting concerns, and that disclosures are handled promptly, fairly, and confidentially.

2. Scope

This policy applies to employees, agency workers, contractors, volunteers, job applicants (where applicable), and students (for concerns about College operations).

It does not cover personal grievances, which should be raised under the College's Grievance Policy.

3. What is Whistleblowing?

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes:

- Criminal offences
- Breaches of legal obligations
- Miscarriages of justice
- Risks to health and safety
- Environmental damage
- Breaches of UK sanctions (financial, trade, transport)
- Deliberate concealment of any of the above

Whistleblowing does not include complaints about employment terms or interpersonal disputes unless they involve serious wrongdoing.

4. Protected Disclosures

To qualify for protection under PIDA:

- The disclosure must be made in the public interest.
- The whistleblower must reasonably believe the information shows wrongdoing.
- The disclosure must be made to an appropriate person or body.

5. Reporting Channels

Internal Reporting:

- Line Manager
- HR: Executive Director – People and Purpose
- CEO and Principal
- Governors; if the concern relates to the Executive Director or the CEO and Principal
- This can be done in writing (**Appendix 1**) or verbally and reference to this policy should be made.
- Email:
- Anonymous reporting via secure online form (link on intranet)
- If an employee does not report their concerns to the College, they should take them direct to the [appropriate organisation or regulatory body with authority for that area](#).

External Reporting:

If internal reporting is not appropriate, disclosures may be made to prescribed persons:

- Ofsted (education standards)

- Department for Education
- HM Treasury (financial sanctions)
- the Financial Services Authority;
- Ofqual
- Secretary of State for Business and Trade (trade sanctions)
- Secretary of State for Transport (transport sanctions)
- Health and Safety Executive
- Information Commissioner's Office
- your trade union
- the Police
- the Local Government Ombudsman
- Equality and Human Rights Commission
- a relevant professional body or regulatory organisation
- a relevant voluntary organisation

You have a duty to the College not to disclose confidential information. This does not prevent you from seeking independent advice at any stage or from discussing the issue with the charity Protect (previously called Public Concern at Work) on 020 3117 2520 or www.protect-advice.org.uk in accordance with the provisions of the Public Interest Disclosure Act 1998.

6. Procedure

6.1 Step 1: Raise the concern internally or externally as appropriate.

Reporting concerns to the media, in most cases will lead to the loss of your whistleblowing law rights.

6.2 Step 2: The concern will be acknowledged within 10 working days.

Assess whether the disclosure is appropriate to be dealt under this policy or the grievance policy. The College will confirm whether the disclosure falls under this policy or another procedure (e.g., grievance).

6.3 Step 3: An investigation will be conducted by an impartial officer.

Where an investigation is necessary, it may take the form of one or more of the following:

- an internal investigation by College upon appointment of an Independent Investigative Officer (IIO).
- an investigation by the Internal Audit Service.
- a referral to the Police.
- the setting up of an external independent inquiry.

IIO to report the outcome of the investigation to the Executive Director People and Purpose and/or the CEO and Principal. An outcome of the investigation may be:

- To instigate disciplinary proceedings.
- Contacting appropriate external body/ies.
- No further actions.

6.4 Step 4: Feedback will be provided to the whistleblower (where possible).

6.5 Step 5: Appropriate action will be taken based on findings.

Whistleblowers have the right to remain anonymous. Concerns can be raised anonymously via the secure online form or other channels outlined in this policy. While anonymity may limit the ability to investigate fully, the College will respect and protect anonymity wherever possible. The College will take all reasonable steps to ensure that whistleblowers who choose to remain anonymous are not identified during or after the investigation process.

7. Support and Protection

- Whistleblowers will not suffer detriment or retaliation.
- Confidentiality will be maintained where possible.
- Support (e.g. legal advice, counselling) will be offered.
- Disciplinary action will be taken against those who victimise whistleblowers.
- Trade Union members are encouraged to seek support from their respective trade union.
- Any attempt to identify or retaliate against an anonymous whistleblower will be treated as gross misconduct.

8. Training and Awareness

- Annual training for staff on whistleblowing procedures.
- Awareness campaigns to promote a “speak up” culture.
- Managers will receive additional training on handling disclosures sensitively and lawfully.

9. Monitoring and Review

- The policy will be reviewed regularly or in response to legislative changes.
- Data on disclosures, outcomes, and time to resolution will be monitored.
- An anonymised annual report will be shared with the Governing Body to ensure transparency and accountability.

10. Gender Identification & Gender Reassignment

Buckinghamshire College Group recognises and respects the diversity of its staff and students. While the UK Supreme Court ruling (April 2025) clarified that for the purposes of the Equality Act 2010, “man,” “woman,” and “sex” refer to biological sex at birth, the College’s position reflects general practice rather than law. The ruling does not affect the protected characteristic of gender reassignment, so trans people remain protected from discrimination under the Equality Act. The College will continue to promote inclusivity by encouraging the use of preferred names and pronouns in HR systems and professional contexts. This is a matter of organisational practice, not a legal requirement.

Equality Impact Statement

Section One	
College:	Buckinghamshire College Group
Departments Effected:	Whole College
Who is responsible for the Equality Impact Assessment?	Executive Director People and Purpose
Title (of the policy/practice/decision)	Whistleblowing Statement of Policy and Procedure
Description (Provide a brief description of the policy/practice/decision)	This policy is committed to the highest standards of openness, integrity, and accountability. This policy outlines the procedure for employees and stakeholders to report certain types of wrongdoing or misconduct within the College, in the public interest. It provides a clear framework for raising concerns in line with the Public Interest Disclosure Act 1998 (PIDA) and relevant UK legislation updates as of 2025.

Section Two – Stakeholder Consultation		
2	Who are the main stakeholders and what consultation exercise are you planning to undertake, if required (eg, consultation with Employee Voice, Trades Unions, Staff groups, Student groups?)	Staff, Students, Apprentices, partners and Trade Unions
3	Are there concerns that this could result in differential or adverse impact on any Equality Groups (Protected Characteristics as identified by the Equality Act 2010)	No

Section Three

Please identify how the policy may impact the following protected characteristics:

- Identify any positive impacts the policy/practice/decision may have on equality groups.
- Identify any negative impacts the policy/practice/decision may have on equality groups.
- Propose measures to mitigate or eliminate identified negative impacts.

Protected Characteristics	Impact High/Medium/ Low/N/A	Action(s) you will take to mitigate or remove the negative or adverse impact if identified? <i>Propose measures to mitigate or eliminate identified negative impacts</i>
1. Age <i>(eg, are there ways older or younger people may find it difficult to engage?)</i>	Low	No adverse impacts identified. Promote age-inclusive recruitment and development; monitor age diversity; offer flexible working.
2. Disability <i>(eg do you need to consider large print or easy read?)</i>	Low	Ensure accessible formats and assistive technologies; inclusive recruitment; workplace adjustments; SEND and High Needs policies in place.
3. Gender identification <i>(eg is your language inclusive of LGBTQ+ groups?)</i>	Low	Update HR systems for preferred names/pronouns; deliver inclusion training.

4. Gender Re-assignment <i>(eg is your language inclusive of trans and non-binary people?)</i>	Low	Provide manager guidance; gender-neutral facilities; protect confidentiality.
5. Marriage and civil partnership <i>(eg does it treat marriage and civil partnerships equally?)</i>	Low	Review benefits and leave policies; monitor promotion bias.
6. Pregnancy & Maternity <i>(eg with this have an impact on pregnant or those on family leave; breastfeeding services?)</i>	Low	Offer flexible working, phased return, parental support; ensure non-discrimination.
7. Race / Ethnicity <i>(eg does it take into account the needs of people from different groups)</i>	Low	Monitor recruitment/progression data; anti-racism training; engage diverse networks.
8. Religion or Belief <i>(eg do people from faith groups experience any specific disadvantage)</i>	Low	Accommodate observances; provide prayer spaces; inclusive holiday policies.
9. Sexual Orientation <i>(eg is your language inclusive of LGBTQ+ groups?)</i>	Low	Celebrate diversity; enforce anti-discrimination; support LGBTQ+ networks.

Section Four – Monitoring and Review

Does your criteria and procedure promote fairness and equal opportunities? <i>Utilize relevant data sources, such as demographic information, student feedback, or staff surveys, to inform the analysis as necessary</i>	Yes
How will you monitor and evaluate the effectiveness of these measures to determine whether it has been effectively and fairly applied	We will monitor and evaluate the effectiveness of these measures by regularly reviewing whistleblowing cases for fairness and consistency, analysing demographic and feedback data, and engaging stakeholders through surveys or forums. Oversight by the Board, supported by HR and internal audit, ensures transparency and accountability.

Section Five – Outcome, Sign-off and Authorisation

Equality Impact Assessment Outcome Select one of the four options below to indicate how the policy will be progressed and state the rationale for the decision	
Option 1: No change required – the assessment is that the policy is robust.	X
Option 2: Adjust the policy or practice – this involves taking steps to remove any barriers, to better advance equality and/or to foster good relations.	
Option 3: Continue the policy or practice despite the potential for adverse impact, and which can be mitigated/or justified	
Option 4: Stop the policy or practice as there are adverse effects cannot be prevented/mitigated/or justified.	
Name & job title of authorised person	Ruth Osgood Executive Director People and Purpose
Equality Impact Assessment was completed on:	October 2025
Date of next review, and by whom? <i>This may include regular reviews, data analysis, and stakeholder feedback</i>	October 2028 Executive Director People and Purpose

Appendix 1 – Form for an employee to make a whistleblowing disclosure

Whistleblowing disclosure	
<p>If you are unsure whether your disclosure concerns a whistleblowing matter, refer to our whistleblowing policy for more details.</p> <p>In some cases, a disclosure relating to a personal matter will be classed as a grievance. If this is the case, we will confirm that your concerns will be dealt with under our grievance policy.</p> <p>Any employee who makes a whistleblowing disclosure will be protected against any detrimental treatment, up to and including a dismissal, on the basis that they have made this disclosure. If, however, the employee knowingly makes a false allegation, this may result in disciplinary action being taken against them.</p>	
Employee name:	
Job title:	
Line manager:	
Please provide the names and job titles of any person your disclosure relates to:	
Please provide full details of your concerns including details of any incidents, any relevant policies or documents, any previous action taken, etc:	
Please provide details of any witnesses to these matters:	
If you have a preferred outcome to this matter, please outline this below:	
<p>By signing this form, you confirm that you are making this disclosure in line with our whistleblowing policy and understand that this matter will be dealt with under this procedure.</p>	
Signed:	
Date:	
For College use only:	
Received by:	
Date received:	

Appendix 2 – Form to record a whistleblowing investigation

This form is to be completed when investigating employee disclosures made under the whistleblowing procedure.

Employee name:	
Job title:	
Line manager:	
Investigating officer:	
HR support officer:	
Details of disclosure	
<i>Date:</i> <i>Location:</i> <i>Account of alleged events:</i>	
Witness interviews held	
Details of evidence reviewed	
Findings	
Conclusion (tick as appropriate)	
Investigation finds no evidence to support disclosure: no further action to be taken	<input type="checkbox"/>
Investigation finds evidence to support disclosure: formal action to be instigated	<input type="checkbox"/>
Additional comments/recommendations	
Investigating officer signed:	
Date:	
HR support officer signed:	
Date:	