Whistleblowing Policy and Procedure

1 Purpose and scope

1.1 All colleges face the risk of things going wrong or of unknowingly harbouring malpractice. South Thames Colleges Group takes malpractice very seriously and is committed to conducting our institution with honesty and integrity. 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.

1.5 Students are also encouraged to raise genuine concerns about suspected wrongdoing by making a complaint using the Group's Complaints, Compliments and Feedback Policy, accessed via the Website: Link

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:

- criminal offences, including those in relation to bribery and corruption and tax evasion facilitation;
- practices which could compromise the integrity and security of exams
- miscarriages of justice;
- danger to the health and safety of any individual;
- disclosures regarding past, present, or anticipated sexual harassment of any individual by another member of STCG staff or by a third party . Examples of this behaviour include unwanted advances, inappropriate jokes, hostile environments, or offensive comments
- damage to the environment;
- breach of any legal or professional obligation, including those in relation to bribery and corruption and tax evasion facilitation;
- 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 promptly with your line manager. If you feel you cannot tell your line manager, for whatever reason, you should raise the issue with the Head of Governance or the Director of Human Resources.

5.2 A concern can be raised by telephone, in person or in writing. 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).

5.3 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.

5.4 You are encouraged to identify yourself when making a disclosure. If an anonymous disclosure is made, we will not be in a position to notify you of the outcome of action taken. Anonymity also means that we will have difficulty in investigating such a concern. STCG reserves the right to determine whether to apply this procedure in respect of an anonymised disclosure in light of the following considerations:

- The seriousness of the issues raised in the disclosure;
- The credibility of the concern; and
- How likely it is that the concern can be confirmed from attributable sources.

5.5 For further guidance in relation to this policy and procedure, or concerning the use of the disclosure procedure generally, you should speak in confidence to the Head of Governance.

6. Responding to concerns raised

6.1 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.

6.2 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. Possible actions could include referral to STCG's auditors; or referral to relevant external bodies such as the police, Ofsted, the NSPCC, Health and Safety Executive or the Information Commissioner's Office. We will endeavour to complete investigations within a reasonable time.

6.3 If we consider that the disclosure does not have sufficient merit to warrant further action, you will be notified in writing of the reasons for STCG's decision and advised that no further action will be taken by STCG under this policy and procedure. Considerations to be taken into account when making this determination may include the following:

- If STCG is satisfied that you do not have a reasonable belief that suspected malpractice is occurring; or
- If the matter is already the subject of legal proceedings or appropriate action by an external body; or
- If the matter is already subject to another, appropriate College procedure.

6.4 If appropriate, any internal investigation would be conducted by a manager **at** STCG without any direct association with the individual to whom the disclosure relates, or by an external investigator appointed by STCG as appropriate. S/he will investigate the concerns raised and possible courses of action to be taken (this may involve a confidential discussion with the Chair of the Audit Committee).

6.5 Any recommendations for further action will be addressed to the Group Principal / CEO or Chair of the Corporation as appropriate in the circumstances. The recipient will take all steps within their power to ensure the recommendations are implemented unless there are good reasons for not doing so.

6.6 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.

6.7 If you are not satisfied that your concern has been appropriately addressed, you can appeal against the outcome by raising the issue with the Group Principal / CEO within ten working days of receiving the outcome. The Group Principal / CEO will make a final decision on action to be taken and notify you of the outcome in writing.

6.8 A process flow and timeline showing how the Group intends to deal with disclosures is attached to this policy .

7. Confidentiality

7.1 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.

7.2 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.

8. Raising your concern externally (exceptional cases)

8.1 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.

8.2 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, the NSPCC 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

8.3 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. If you seek external advice you must be careful not to breach any confidentiality obligations or damage STCG's reputation in so doing.

8.4 The NSPCC whistleblowing helpline is available if you do not feel able to raise concerns regarding child protection failures internally. The national child abuse whistleblowing advice line is on 0800 028 0285 or help@nspcc.org.uk.

9. Protection and support for those raising concerns

9.1 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.

9.2 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 Head of Governance or Director of HR immediately. If the matter is not dealt with to your satisfaction, you should raise it formally using our Grievance Procedure.

9.3 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.

9.4 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. Further information and contacts

10.1 If you have any queries about the application of this policy, please contact Helen Meredith, Head of Governance of Daniel Fraser, Director of HR in the first instance.

10.2 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 Ofsted Whistleblowing helpline: 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:https://www.hse.gov.uk/contact/tell-us-about-a-health-and-safety-issue.htm
The National Society for the Prevention of Cruelty to Children (NSPCC)	The national child abuse whistleblowing advice line for safeguarding concerns is on 0800 028 0285 or Email : help@nspcc.org.uk. Website: https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/

10.3 Protect (formerly known as Public Concern at Work) offers information and advice at https://protect-advice.org.uk/ It also provides a free helpline offering confidential advice on whistleblowing on **020 3117 2520**

10.4 The Government's list of prescribed bodies who you can make a disclosure to can be found at: https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies#childrens-interest

10.5 You may want to request counselling confidentially or other support from STCG's occupational health service. Any such request for counselling or support services should be addressed to the Director of Human Resources. Such a request would be made in confidence.

10.6 This policy has been approved and authorised by the Corporation.

SOUTH THAMES COLLEGES GROUP

PROCESS FLOW AND TIMELINE FOR WHISTLEBLOWING DISCLOSURES

1. RECEIPT AND ACKNOWLEDGEMENT (DAYS 1–3)

- **Action:** Acknowledge receipt of whistleblowing disclosure in writing within **2–3 working days**.
- **Process:** Reassure the whistleblower of confidentiality.

2. INITIAL ASSESSMENT/TRIAGE (WORKING DAYS 1–10)

- **Action:** Determine if the concern qualifies as whistleblowing (public interest, wrongdoing) rather than a personal grievance.
- **Action:** Determine if immediate, urgent action is needed (e.g., safety risk).
- **Action:** Determine if the disclosure is too vague, requires no action, or if a formal investigation is needed.

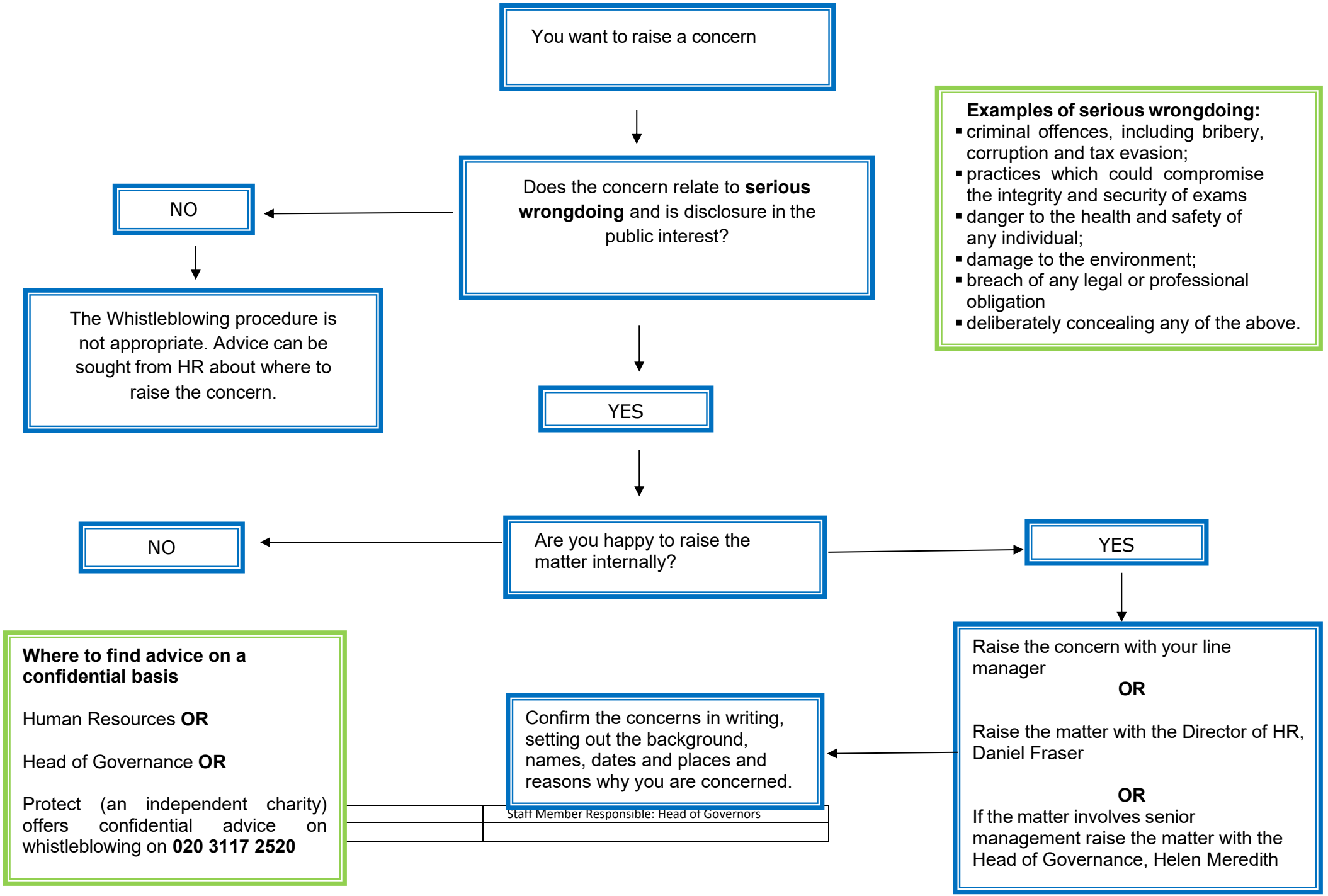
3. INVESTIGATION PLANNING AND EXECUTION (WEEKS 1–6)

- **Action:** Appoint an impartial investigator (internal or external).
- **Action:** Conduct interviews and gather evidence (documents, emails, etc.).
- **Timeline:** Aim for a full response within **20 working days** (roughly 4–6 weeks).
- **Updates:** Provide regular progress updates to the whistleblower.

4. FINAL REPORT AND ACTION (POST-INVESTIGATION)

- **Action:** Complete investigation and report findings ideally within 20 working days to 6 weeks
- **Action:** Determine necessary actions (e.g., disciplinary proceedings, changing procedures, notifying police/regulators).
- **Action:** Final feedback to the whistleblower, respecting confidentiality obligations.

SOUTH THAMES COLLEGES GROUP WHISTLEBLOWING FLOWCHART



	Staff Member Responsible: Head of Governors