

## TELFORD COLLEGE'S WHISTLEBLOWING POLICY & PROCEDURE

<b>Ref No</b>	0076	<b>Version</b>	V9
<b>Dept</b>	College-wide	<b>Last Updated</b>	May 2025
<b>Responsible Manager</b>	Governance Professional	<b>Next Review</b>	May 2026
<b>Date Approved</b>	23 June 2025	<b>Category</b>	Public/Private
<b>Where Approved</b>	Corporation	<b>Covers</b>	All

*(Note: This policy is non-contractual and subject to change.)*

The Telford College **Whistleblowing Officer** is:

Joanna Perch  
Governance Professional  
Haybridge Campus, Rm E231  
[Joanna.perch@telfordcollege.ac.uk](mailto:Joanna.perch@telfordcollege.ac.uk)  
Direct Line: 01952 642294

## 1. INTRODUCTION

At Telford College, integrity, transparency, and accountability are at the heart of our operations. We are committed to the highest ethical standards and encourage our staff, governors, contractors, and stakeholders to speak up when they witness wrongdoing.

This policy provides a secure and confidential mechanism for reporting concerns about malpractice, fraud, or unethical conduct.

### **Who is NOT covered by this policy?**

Students: Concerns from students should be raised via the Student Complaints Procedure.

### **Who is covered by this policy?**

This policy applies to:

- Employees (including agency staff, apprentices, and trainees)
- Governors
- Work experience placements
- Contractors and suppliers
- External stakeholders

This Whistleblowing Policy should be read alongside the college's:

- Anti-Bribery Policy
- Anti-Fraud Policy
- Corporate Hospitality Policy
- Counter-Fraud Strategy
- Financial Regulations
- Receipt of Gifts Policy

### **The purpose of this policy:**

By providing reassurance that genuine concerns raised in good faith can be made without fear of reprisal, even if they are found to be mistaken, explaining how to raise concerns and setting out how concerns will be taken seriously, investigated and kept confidential, this policy aims to encourage members of the college community to speak up and report suspected serious misconduct at the earliest opportunity.

The College recognises having a Whistleblowing Policy in place is of little value if members of the college community do not know about it or where to find it – the Policy will continue to be published on the Telford College website and general awareness of the policy will be raised across the college community.

## 2. WHAT IS WHISTLEBLOWING?

Whistleblowing involves reporting serious concerns in the public interest. [The Public Interest Disclosure Act 1998 \(PIDA\)](#) protects individuals who disclose concerns about potential:

- Fraud, corruption, or financial misconduct
- Bribery (Bribery Act 2010)
- Dishonesty
- Miscarriage of justice
- Criminal offences or failing to comply with a legal obligation
- Unethical practices
- Negligence
- Abuse of position / authority
- Health & safety risks
- Environmental damage
- Serious malpractice in assessments or examinations
- Concealment of any wrongdoing

*(this list is not exhaustive)*

### **This policy is not for:**

- Personal employment issues (use the Grievance Procedure)
- Disputes over management decisions unless they involve potential malpractice
- Questioning financial or business decisions taken by the Corporation unless these decisions relate to some danger, fraud or other illegal or unethical conduct connected with the workplace.
- Covering any matters that should be addressed under existing College procedures or used to reconsider any matters that have already been addressed under these procedures.

**If you are unsure about whether this policy is appropriate** for the information you wish to disclose, you are encouraged to speak with the college's Governance Professional (Room E231, [Joanna.perch@telfordcollege.ac.uk](mailto:Joanna.perch@telfordcollege.ac.uk), 01952 642294), or seek confidential advice of the independent charity Protect (Tel: 0203 117 2520 or [www.protect-advice.org.uk](http://www.protect-advice.org.uk)).

## 3. HOW TO RAISE A CONCERN

If you are concerned about any form of malpractice covered by this policy, you should raise the issue with the college Whistleblowing Officer, detailed at the start of this policy. If the college Whistleblowing Officer is unavailable or your concern involves the Whistleblowing Officer, you should raise your concerns with the Chair of the Audit Committee or the college auditors. (further information and contacts, below).

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).

You may wish to consider discussing your concern with a colleague or trade union representative 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.

#### **4. CONFIDENTIALITY & PROTECTION**

Reports are treated confidentially, and your identity will not be disclosed without your consent.

An individual making a disclosure may invite their trade union representative to accompany them or to raise the matter on their behalf and the companion must respect the confidentiality of the disclosure and any subsequent investigation. They will be notified in advance of the meeting if it is necessary for an independent senior officer to be present purely in an observation capacity only.

The College strictly prohibits victimisation of whistleblowers.

Anonymous reports will be considered but it may be more difficult to fully investigate the allegations, for us to protect your position or to give feedback on the outcome of investigations.

#### **4. INVESTIGATION PROCESS**

##### **Reporting:**

Written reports are encouraged to ensure clarity. If the concern is not in writing the Investigating Officer will meet with the individual and take detailed written notes of the concern and seek to agree and sign the notes as a correct record.

##### **Acknowledgment:**

Confirmation of receipt of the disclosure will be sent to the whistleblower within 5 working days.

##### **Initial Review:**

An investigating officer (or external body) will assess the concern as soon as is practicably possible. Upon receipt of the disclosure, the person (or persons) appointed to investigate the concern will interview the individual reporting the concern in confidence and before undertaking any other investigatory interviews.

The purpose of the interview will be to obtain as much information as possible about the grounds for belief that a malpractice has taken place, to determine the credibility of evidence, and to consult about further steps which could be taken. This may result in other persons being interviewed and statements taken as part of the investigation.

If, for good reason, the investigation takes longer than three weeks to complete, the Investigating Officer will provide the whistleblower with a written progress update.

##### **Formal Investigation:**

If necessary, external investigation will be conducted.

##### **Outcome:**

The whistleblower will be informed of the findings (subject to confidentiality laws).

## **5. RAISING YOUR CONCERN EXTERNALLY (exceptional cases)**

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.

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 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) (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>

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.

## **6. MALICIOUS OR FALSE ALLEGATIONS**

If a claim is made in good faith, even if mistaken, there will be no consequences for the whistleblower. However, deliberate false accusations will be dealt with through the Disciplinary Policy.

## Contact Details

The following list contains the contact details for the individuals and organisations named within this policy –The Corporation, College Auditors and Independent advisors.

The Corporation	
<b>Governance Professional</b> Joanna Perch Telford College Haybridge Road (Room E231) Wellington Telford TF1 2NP 01952 642294 <a href="mailto:joanna.perch@telfordcollege.ac.uk">joanna.perch@telfordcollege.ac.uk</a>	<b>Interim Chair of the Audit Committee</b> Chris Pallett c/o Telford College Haybridge Road Wellington Telford TF1 2NP <a href="mailto:chris.pallett@telfordcollege.ac.uk">chris.pallett@telfordcollege.ac.uk</a>
Telford College Internal Auditors	Telford College External Auditors
<b>Validera</b> Counter Fraud & Whistleblowing helpline: 07376 445648 <a href="http://www.validera.co.uk">www.validera.co.uk</a>	<b>Bishop Fleming</b> 0333 321 9000

Independent Advice	
<b>Protect</b> (formerly known as Public Concern at Work) 020 3117 2520 <a href="http://www.protect-advice.org.uk">www.protect-advice.org.uk</a>	<b>Whistleblowing for Employees</b> Government website  Contents: -What is a whistleblower -Who to tell and what to expect -If you're treated unfairly after whistleblowing  Website: <a href="https://www.gov.uk/whistleblowing">https://www.gov.uk/whistleblowing</a>
<b>His Majesty's Chief Inspector of Education, Children's Services and Skills</b> Ofsted Piccadilly Gate Store Street Manchester M1 2WD  Tel: 0300 123 1231 Website: <a href="http://Reporting%20concerns%20&amp;%20whistleblowing">Reporting concerns &amp; whistleblowing</a> Email: <a href="mailto:enquiries@ofsted.gov.uk">enquiries@ofsted.gov.uk</a>	<b>The Health &amp; Safety Executive</b> Tel: 0300 003 1647 Online form: <a href="http://The%20Health%20&amp;%20Safety%20Executive%20Service">The Health &amp; Safety Executive Service</a>