

POLICY

Title: Whistleblowing

Policy Holder: Director of Governance and Legal

Approval Board: College Corporation Board

Version No: v3.0

Last reviewed: March 2026

Review period¹: 2 Years (or when legislation changes)

Summary: The purpose of this policy is to encourage and provide the procedure for the College employees, temporary staff, consultants and contractors to raise and discuss genuine concerns relating to serious malpractice that is in the public interest.

Accessibility: If you would like this information in an alternative format, e.g. Easy to Read, large print, Braille or audio tape, or if you would like the procedure explained to you in your language, please contact the College's marketing team on 01603 773 169.

Further information: If you have any queries about this policy or procedure, please contact the named policy holder or the College's marketing team on 01603 773 169.



Legislation or Regulation¹:	<ul style="list-style-type: none"> • Public Interest Disclosure Act 1998 • The Enterprise and Regulatory Reform Act 2013 • Employment Rights Act 2025 • Public Interest Disclosure (Prescribed Persons) (Amendment) Order 2025 • How DfE handles whistleblowing disclosures (June 2025)
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Version Control Document			
Date	Version No.	Reason for Change	Author
July 2016	V 2.0	Amends in response to Scrutton Bland audit	R.Luckett
Dec 2016	V 2.2	Amends and approval	D.Clarke
Oct 2019	V 2.3	References to TEN CEO removed, inclusion of NA Executive Principal	P.Beacock
Nov 2019	V 2.4	Review	J.Mitchell
Mar 2021	V 2.5	Removal of TEN Group references	P.Beacock
July 2022	V 2.6	Review and removal of NES references.	J Mitchell
April 2024	V 2.7	Review	J Mitchell
March 2026	V 3.0	Review	J Mitchell

¹ The Review Period refers to our internal policy review process. The published policy is current and is the most recent approved version.

¹ Further reforms, such as the Office of the Whistleblowing Bill, are being monitored and this Policy will be reviewed upon any changes in the legislation.

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1. Policy Statement

City College Norwich (“The College”) is committed to a culture where concerns in the public interest are raised early and addressed fairly, promptly and lawfully. Workers who speak up will be protected from reprisals, provided that concerns have been raised using this procedure and the employee has acted in good faith. We will keep identities confidential wherever possible and handle disclosures in line with the Public Interest Disclosure Act 1998 (as amended) and applicable guidance for employers.

The College recognises the new statutory duty to take reasonable steps to prevent sexual harassment and will use this policy and allied procedures to support a safe, respectful environment.

2. Policy Aims & Objectives

The purpose of this policy is to encourage and provide the procedure for College employees and volunteers, temporary staff, consultants and contractors to raise and discuss genuine allegations relating to serious malpractice which are in the public interest. Examples of serious malpractice could include:

- Unaddressed risks to students and staff
- Maltreatment of students (including discrimination)
- Criminal offences, including fraud and financial irregularity, bribery and corruption, tax evasion facilitation and failure to prevent fraud
- Failure to comply with a legal or professional obligation
- Miscarriages of justice
- Danger to the health and safety of any individual
- Damage to facilities or systems
- That the environment has been, is being, or is likely to be, damaged
- Creating or ignoring a serious risk of the radicalisation of young people and vulnerable adults under the Prevent Duty.
- Sexual harassment
- Deliberately concealing information relating to any of the above

3. Protection of Whistleblowers (Workers)

- 3.1 The Public Interest Disclosure Act 1998 (“**PIDA**”) became effective on 1 January 1999. Its purpose is to provide procedures for staff to raise concerns relating to serious malpractice within their organisation in a responsible way and at an early stage.
- 3.2 The Act provides protection from detrimental treatment, victimisation and dismissal, provided that concerns have been raised in accordance with the Act.
- 3.3 The PIDA protects disclosure if the employee reasonably believes the disclosure to be true and can show one of the following:
- that a criminal offence has been committed, is being committed or is likely to be committed;
 - that a person has failed, is failing or is likely to fail to comply with any legal obligation to which they are subject;
 - that a miscarriage of justice has occurred, is occurring or is likely to occur;
 - that the health and safety of any individual has been, is being or is likely to be damaged. It must indicate a greater danger than is associated with normal practices; or a danger that is not usually associated;

- that the environment has been, is being or is likely to be damaged;
 - that information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed; or
- is a sanctions-related wrongdoing, under the Public Interest Disclosure (Prescribed Persons) (Amendment) Order 2025.
- 3.4 The Enterprise and Regulatory Reform Act 2013 (sections 17-20) introduced a series of changes to the PIDA, which strengthens protection for whistleblowers, expressly requiring disclosures to be in the public interest and making employers liable for bullying of disclosers by colleagues.
- 3.5 From 6 April 2026, the Employment Rights Act 2025 extends the protection of a 'worker' who raises concerns in accordance with PIDA to a 'worker' who 'blows the whistle' on sexual harassment.

4. Definitions

Whistleblowing: The term whistleblowing can be defined as raising a public interest concern about a wrong doing, malpractice or poor practice within an organisation as set out within the PIDA, referred to in 3.3. The concern must be a genuine concern about a criminal offence, breach of a legal obligation, miscarriage of justice, danger to health or safety of any individual, damage to the environment and the deliberate covering up of wrongdoing in any of the above categories.

The Discloser: The individual raising the concern.

The Disclosee: The individual to whom the Discloser raised the concern.

In good faith: Means to raise a concern honestly so that the concern can be addressed. A disclosure made in good faith to the employer will be protected if the whistleblower has a reasonable belief that the information tends to show that the malpractice has occurred, is occurring or is likely to occur.

Public Interest: The disclosure must affect or risk affecting more than the individual raising it (e.g. wider staff, students, stakeholders, the public).

A 'worker': In accordance with the Employment Rights Act 1996 section 230(3), summarised as an individual who has entered into or works under (or, where the employment has ceased, worked under):

- (a) a contract of employment, or
- (b) any other contract, whether express or implied, whether oral or in writing, whereby the individual undertakes to do or perform personally any work or services for another party to the contract

For the full legal definition, please refer to the legislation.

5. Scope

This Policy applies to all Workers, including permanent and temporary employees of the College, Governors and contractors.

It should be noted that, whilst the process for raising a concern covered by this policy is available to all employees, Governors and contractors, the protection afforded by the PIDA

applies only to individuals defined as a 'worker' by section 230(3) and 43K of the Employment Rights Act 1996 (see 'Definitions' section above).

Students, parents/carers and other stakeholders should use the Student Complaints, Safeguarding, or other relevant procedures unless they are also a Worker making a protected disclosure. Safeguarding concerns should be raised using the Safeguarding Procedure. [City College Norwich Policies and Procedures](#)

6. General points about raising a concern

- 6.1 All concerns raised through the whistleblowing procedure must meet the criteria in section 3. General concerns relating to bullying or harassment, grievances or safeguarding should not be made under this whistleblowing procedure but instead be made using the appropriate procedure by following the relevant College policies (see section 13). To report a health and safety incident please refer to the Health, Safety and Wellbeing Policy.
- 6.1 A disclosure should, as far as possible, set out factual information rather than unsupported allegations or speculation.
- 6.2 All concerns should be raised at an early stage using the procedure in section 7.
- 6.3 Whistleblowers are encouraged not to take concerns outside of the College, other than as stated in section 11, and concern should be raised internally in accordance with this Policy in the first instance. Complaints made externally may hamper a speedy, full and professional investigation of the concern raised and complainants could lose their whistleblowing law rights. Protection may still apply where disclosures are made lawfully, and Workers may make a protected disclosure to a prescribed person, legal adviser or regulator in accordance with the law.
- 6.4 Concerns should be raised if they are in the public interest, which includes the interest of the College, staff and/or students (section 3.4).
- 6.5 The Discloser's identity will be kept confidential. However, if a concern results in disciplinary or legal action, the Discloser may be required to give evidence.
- 6.6 No member of staff must threaten or retaliate against an individual who has raised a genuine concern and the College will not tolerate any such harassment or victimisation. Any person involved in such conduct may be subject to disciplinary action.
- 6.7 If at any stage of this procedure an employee feels that they are being subject to informal or formal coercion, pressure, bullying, harassment or victimisation due to making a disclosure they should raise this matter in writing with the Director of Governance and Legal (see section 14 for contact details).
- 6.8 Employees will not be disciplined for raising concerns in good faith through this procedure. However, to ensure the protection of all College staff, those who raise a concern frivolously or which they do not reasonably believe to be true may be liable to disciplinary action.
- 6.9 Anonymous disclosures are discouraged but will be considered at the College's discretion. Disclosers are encouraged to identify themselves when raising concerns. If an anonymous disclosure is made, the College will not be in a position to notify the individual to explain the outcome of action taken.

Anonymity also means that the College will have difficulty in investigating a concern. The College 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.

- 6.10 It is a serious disciplinary offence to:
- deliberately raise unfounded allegations
 - victimise or harass a member of staff for raising concerns
 - actively deter someone covered under this policy from raising a genuine concern.

7. Procedure for raising concerns

- 7.1 **Stage 1:** Allegations (that meet the criteria listed in section 3) should be raised by the Discloser, verbally or in writing, to their immediate line manager or head of department, making it clear that they are making a disclosure under the Whistleblowing Procedure. If the Discloser does not feel able to raise the concern with their line manager or head of department, they should raise the concern verbally or in writing (declaring any personal interest) to the appropriate College Principal or Executive Director.
- 7.2 **Stage 2:** Should the Discloser not be satisfied with the action taken at Stage 1, concerns should be raised formally in writing (declaring any personal interest) by completing the attached Whistleblowing Form (Appendix 1) to the CEO and Principal.
- 7.3 If the concern relates to the CEO and Principal, the concern should be raised formally in writing (declaring any personal interest) by completing the attached Whistleblowing Form (Appendix 1) to the Chair of the Corporation of City College Norwich.
- 7.4 If the concern relates to the Chair of the Corporation, the Vice Chair of the Corporation or any of the Governors of City College Norwich, the concern should be raised with the Director of Governance and Legal by completing the attached Whistleblowing Form (Appendix 1).
- 7.5 At the time the concern is raised, the Discloser should make it clear that they are using the Whistleblowing Procedure. The Director of Governance and Legal must be informed of the existence of a concern having been raised under this procedure by the Disclosee.
- 7.6 Confidential advice for either the Discloser or the Disclosee is available from Protect, a registered charity which advises on serious malpractice in the workplace (see section 14 for contact details)

8. Investigations into concerns

- 8.1 The College will treat all disclosures seriously and sensitively and will fully investigate the matter.
- 8.2 Following the written disclosure referred to in section 7, the Discloser will be interviewed, in confidence, within two working days by the CEO and Principal, Chair of the Corporation or Director of Governance and Legal (“the Interviewer”). The Discloser may be accompanied at this interview for support purposes only by a work colleague

or trade union representative. Any person accompanying a Discloser must not be involved in the proceedings relating to the concern or be involved in the concern itself and must respect the confidentiality of the disclosure and any subsequent investigation.

- 8.3 If the concern reported relates to an accusation of potential misconduct, the identified person(s) will be interviewed to give their account.
- 8.4 If the concern relates directly to the activities of the CEO and Principal, the interview will be undertaken by the Chair of the Corporation, the Director of Governance and Legal and an independent third person.
- 8.5 If the concern relates directly to the activities of the Governors, the interview will be undertaken by the Chair of the Corporation, the Director of Governance and Legal and an independent third person.
- 8.6 If the concern relates directly to the Chair of the Corporation, the Director of Governance and Legal will consult with the Vice Chair of the Corporation to determine an appropriate investigatory solution, which will include involving an independent third party.
- 8.7 The person undertaking the interview will provide the Discloser with a response within ten working days. Timescales are indicative and may be extended where the matter is complex; the Discloser will be kept informed of progress

9. Assessment stage

- 9.1 Following the initial interview(s) as referred to in section 8, an assessment of what action should be taken will be made by the Interviewer.
 - 9.1.1 If the assessment is that the concern can be resolved quickly (i.e. within one working week) it will be brought to the attention of the appropriate member of the senior management team for resolution and the Discloser will be notified. This may lead to the implementation of other formal procedures, e.g. Disciplinary Procedure.
 - 9.1.2 If the assessment is that the concern is of a complex nature, it will be referred to the CEO and Principal for further investigation. In the case of a referral to the CEO and Principal, the Discloser will be notified within ten working days.
- 9.2 If following interviews and/or investigation it is decided that no action will be taken the Discloser will be given a written explanation of the reasons for the decision.
- 9.3 For a concern regarding the CEO and Principal, the Chair of the Corporation or the Governors, those conducting the interviews described in 8.5 and 8.6 will determine whether the concern can be resolved quickly and identify the necessary actions to be taken. The Director of Governance and Legal will be responsible for ensuring these actions are taken. If the assessment is that the concern is of a more complex nature, it will be referred to the Chair of the Audit and Risk Committee for further investigation. The Chair of the Audit and Risk Committee may engage the services of the Internal Auditors if necessary.

10. Stage 3 - Appeal

- 10.1 If the Discloser wishes to appeal against a decision made or is dissatisfied with actions taken within Stage 2, they may do so in writing to the Chair of the Corporation by completing the attached Whistleblowing Appeal Form (Appendix 2) within five working days of receipt of the outcome of the investigation. Any appeal would be heard by the Chair of the Corporation, together with the Vice Chair of the Corporation or the Chair of the Audit and Risk Committee and an independent third party (in total, three members of the Appeal Panel). If the Chair of the Corporation, Vice Chair of the Corporation or Chair of the Audit and Risk Committee has been involved in any investigation, the appeal will be passed to two Governors of City College Norwich who had no previous involvement in the decision together with the independent third party.

11. Stage 4 – Raising your concern externally (exceptional cases)

- 11.1 If the Discloser feels they are unable to raise their concerns internally and reasonably believes that the information and allegations are substantially true, or after exhausting the Internal Appeal process, considers that their concern has not been dealt with and settled appropriately then it may be appropriate to raise the matter with another prescribed person such as a regulator (e.g. Ofsted, Department of Education, Office for Students or Health and Safety Executive), 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 (see section 14). Further information and contacts are set out below and on the gov.uk website at [Whistleblowing: list of prescribed people and bodies - GOV.UK](#)

If the Discloser seeks advice outside of the College, they must be careful not to breach any confidentiality obligations or damage the reputation of the College in so doing.

12. Record Keeping and Reporting

- 12.1 A confidential record of any concern raised using this procedure, its nature and the outcome of the investigation will be kept centrally by the Director of Governance and Legal.
- 12.2 Previous records may be used for cross-referencing and monitoring purposes when looking at future concerns.
- 12.3 Concerns raised using this procedure will be reported annually to the Audit and Risk Committee.

13. References to related policies

- Financial Regulations
- Safeguarding
- Health Safety and Wellbeing
- Grievance
- Dignity at Work
- Incident and accident reporting
- Sexual Harassment
- Disciplinary

14. Contact Details

- 14.1 Please contact the Director of Governance and Legal for advice on any aspect of this policy and procedure.

Director of Governance and Legal
Thetford Building
City College Norwich
Ipswich Road
Norwich
NR2 2LJ

- 14.2 Protect is a source of further information and advice and further details can be found online here <https://protect-advice.org.uk>. It also provides a free helpline offering confidential advice: 020 3117 2520.

- 14.3 Relevant regulators include:

His Majesty's Chief Inspector of Education, Children's Services and Skills

The Chief Inspector
Ofsted
Piccadilly Gate
Store Street
Manchester M1 2WD

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

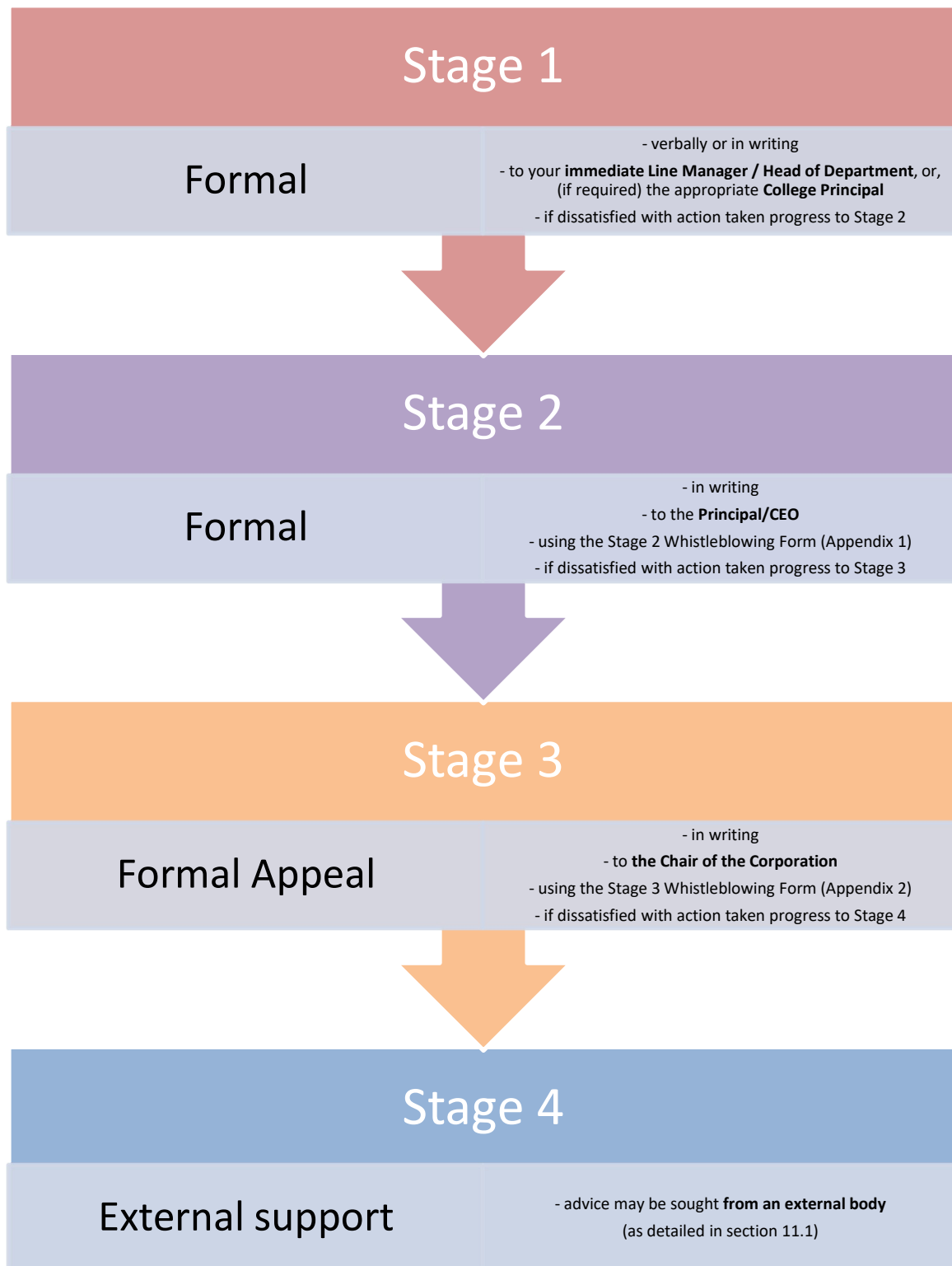
Website: www.gov.uk/contact-dfe

15. Equal Opportunities Statement

This policy and procedure has been assessed against the protected characteristics outlined in the Equality Act 2010 and no apparent disadvantage to equal opportunities has been determined.

If you have any comments or suggestions in relation to equal opportunities of this policy or procedure, please contact the policy holder.

16. Whistleblowing Process Flow Chart



Appendix 1 – Whistleblowing Form

WHISTLEBLOWING FORM: Stage 2 (Formal)

Name:	
Post title:	
School/Centre:	
Location:	
Line Manager's Name:	

Details of Stage 1:

Date concern raised:	
Who was the concern raised with? Was this verbally or in writing?	
Outcome of Stage 1.	

Whistleblowing Details:

Please outline the details (continue on a separate sheet if necessary):
How would you like the concern to be resolved?

Signed:		Date:	
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Office Use Only

Date Received:		Date Acknowledged:	
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Appendix 2 – Whistleblowing Appeal Form

WHISTLEBLOWING APPEAL FORM: Stage 3 (Appeal)

Name:	
Post title:	
School/Centre:	
Location:	
Line Manager's Name:	

Stage 2 Details (to be completed by HR):

Date concern raised:	
Who dealt with Stage 2?	
Briefly outline the outcome of Stage 2	

Appeal Details:

Please outline only the grounds of your appeal against Stage 2 outcome(s) (continue on a separate sheet if necessary):
How would you like the concern to be resolved?

Signed:		Date:	
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Office Use Only

Date Received:		Date Acknowledged:	
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