UKMC

Staff Whistleblowing Policy

Date	Author	Summary of Changes	Version	Authorised
March 2024	Head of HR	General update following review	1.0	Academic Board, Aug 2024
July 2025	Head of Compliance	Template reformatting and amendment to include E6 Report and Support reference Comprehensive update to fulfil regulatory requirements, including the Public Interest Disclosure Act 1998 and OfS conditions E7 and E8; expanded categories of concern; internal, external and prescribed-person reporting routes (including the Office for Students); investigation, protection and confidentiality arrangements; oversight by the Audit and Risk Committee; and cross-reference to the Risk Management Policy and Framework	1.1	Academic Board, Sept 2025
September 2026	Director of Compliance	Formatting and clarity of escalation and communication of information in section 12 investigation process.	1.2	01/09/2026 Chair of Q&S Committee Subject to AB approval

Policy/Procedure Management and Responsibilities	
Policy/Procedure Owner	Overseen by the Director of Compliance, approved by the Academic Board. HR or recipients of whistleblowing concerns escalate promptly referring to the responsible persons and investigation process sections, for acknowledgement and to initiate the policy processes. Day-to-day implementation and communication are delegated via senior leadership.

	Oversight of whistleblowing concerns relating to fraud, public funds and significant risk is provided by the Audit and Risk Committee.
Equality Analysis	EDI Committee
Authorised By	Academic Board
Effective From	September 2025
Next Review	July 2026
Internal/External	Both
Document Location	UKMC | Policies and Legislation & internal Policy development Area etc.
Linked Documents and Policies Internal	Risk Management Policy and Framework; Anti-Bribery and Corruption Policy; Fraud and Public Funding Declaration; Conflicts of Interest Policy; Safeguarding and Prevent Policy; Data Protection Policy; Disciplinary and Grievance Procedures; ACAS guidance; Protect (whistleblowing advice charity)
Dissemination Plan	Public availability on the UKMC website
Accessibility	**Alternative formats available on request** to quality@ukmc.ac.uk

1. Purpose

The purpose of this Whistleblowing Policy is to encourage and enable employeesand other stakeholders of UK Management College ("the College") to raise concerns about suspected wrongdoing, malpractice, or danger at the earliest opportunity, and in the knowledge that they will be taken seriously, treated fairly and protected from detriment.

The Student Whistleblowing policy with information that is accessible for students to escelate concerns is also available on the website.

The College is committed to the highest standards of openness, integrity and accountability, and to the proper stewardship of public funds. Whistleblowing is a key part of the College's control environment and its arrangements for managing risk and for preventing, detecting and stopping fraud and the inappropriate use of public funds.

2. Policy statement

The College recognises that most individuals will be reluctant to report concerns if they fear they may suffer as a result, or that nothing will be done.

The College gives a clear commitment that anyone who raises a genuine concern in good faith under this policy will be supported, that their concern will be investigated properly, and that they will not suffer any detriment for having raised it — even if the concern later proves to be mistaken.

This policy is intended to operate alongside, and not to replace, the College's ordinary grievance and complaints procedures.

3. Scope

This policy applies to all individuals associated with the College, including employees, workers, agency and contract staff, contractors, suppliers, volunteers and members of the governing body.

It enables concerns to be raised about a wide range of matters that are in the public interest, as set out in Section 5.

It applies across all campuses and to all of the College's franchised and validated provision.

4. Legal and regulatory framework

This policy is designed to comply with the Public Interest Disclosure Act 1998 (PIDA) and the Employment Rights Act 1996, which protect workers who make a "qualifying disclosure" in the public interest from suffering detriment or dismissal. It also supports the College's compliance with the regulatory requirements of the Office for Students (OfS), in particular initial conditions E7 (effective governance) and E8 (fraud and the inappropriate use of public funds), and reflects the principles of the Bribery Act 2010, the Equality Act 2010 and relevant ACAS guidance. The policy forms part of the College's comprehensive arrangements for preventing, detecting and stopping fraud and the misuse of public funds, and operates alongside the Risk Management Policy and Framework and the Anti-Bribery and Corruption Policy.

5. What concerns can be raised

This policy covers concerns where an individual reasonably believes that wrongdoing or malpractice has occurred, is occurring, or is likely to occur, and that it is in the public interest to raise it. Such concerns include, but are not limited to:

Table 1 — Categories of concern

Category	Examples
Fraud and financial impropriety	Fraud, theft, bribery, corruption, or the inappropriate use, loss or misuse of public funds or student finance.
Inaccurate data for public funding	The submission of false or inaccurate data to the Office for Students, the Student Loans Company, HESA/Jisc, awarding partners or other bodies for purposes related to public funds.
Criminal offences	Any criminal offence that has been, is being, or is likely to be committed.
Breach of legal or regulatory obligation	Failure to comply with a legal obligation or with OfS conditions of registration or other regulatory requirements.
Academic misconduct	Malpractice in admissions, assessment, awards, research integrity or the quality and standards of provision.
Health, safety and safeguarding	Danger to the health or safety of any individual, or safeguarding and Prevent concerns.
Data protection	Misuse or unlawful processing of personal data, or a serious information-governance breach.
Environmental damage	Damage to the environment.
Concealment	The deliberate concealment of any of the above.

An individual does not need to have proof that wrongdoing has occurred; a reasonable, genuine and good-faith belief is sufficient. It is not necessary for the matter to relate to the individual personally. However, evidence supports a more thorough investigation capability and is requested wherever possible.

6. What is not covered by this policy

This policy is not the route for matters that are dealt with under other procedures. Personal grievances about an individual's own employment (such as pay, terms or working relationships) should be raised under the Grievance Procedure;

student whistleblowing concerns should be raised under the UKMC Student Whistleblowing Policy;

student academic and service complaints should be raised under the Student Complaints Procedure;

safeguarding, bullying, harassment and sexual-misconduct concerns may also be reported through the E6 Report and Support route [Report & Support for Harassment & Sexual Misconduct]() (see Section 13).

Where a concern raised under another procedure discloses wider wrongdoing in the public interest, it may be considered under this policy.

7. How to raise a concern — internal routes

Concerns should normally be raised internally and as early as possible. An individual may raise a concern with any of the following, choosing the route most appropriate to the nature of the concern:

Generally, concerns can be raised through the [In Need Support Form - E6 Bullying, Harassment, Discrimination & Sexual Misconduct (Page 1 of 3)]

Table 2 — Internal reporting routes

Contact	When to use	Contact
Head of HR	Employment-related concerns and general whistleblowing reports.	Reportsupporrt@ukmc.ac.uk
Director of Compliance	Concerns relating to regulatory compliance, fraud, public funds or data accuracy.	Reportsupporrt@ukmc.ac.uk
Designated Safeguarding Lead (Registrar)	Safeguarding, Prevent and student-welfare concerns.	Reportsupporrt@ukmc.ac.uk OR Safeguarding@ukmc.ac.uk
Chair of the Audit and Risk Committee	Where the concern involves senior management, finance, fraud or public funds, or where other routes are inappropriate.	Provost@ukmc.ac.uk
Chair of the Board of Directors	Independent route where the concern relates to the Chief Executive or the integrity of senior governance.	Provost@ukmc.ac.uk

Concerns may be raised verbally or in writing, or through the form above.

Individuals are encouraged to provide as much detail and supporting evidence as possible to enable a thorough investigation, including what is happening, who is involved, and relevant dates and locations.

Concerns may also be raised anonymously by post; while the College will consider anonymous reports, it may be more difficult to investigate them or to provide feedback, and individuals are therefore encouraged to identify themselves where possible, with the assurance of confidentiality set out in Section 9.

8. External and prescribed-person routes

The College strongly encourages individuals to raise concerns internally so that they can be addressed quickly and effectively. However, the law recognises that there may be circumstances in which it is appropriate to report to an external body — for example where an individual reasonably believes they would be victimised, that evidence would be concealed or destroyed, or that the matter has not been addressed internally. Under Public Interest Disclosure Act 199 (PIDA), certain external bodies are “prescribed persons” to whom protected disclosures may be made.

The Office for Students is a prescribed person under the Public Interest Disclosure Act 1998 for disclosures about higher education providers in England, including the proper use of public funds and compliance with conditions of registration. Other external routes include the College’s external auditors; relevant regulators and authorities (for example HM Revenue and Customs, the Information Commissioner’s Office for data protection, the Health and Safety Executive, and the police or the National Crime Agency for criminal matters); and Protect, the independent whistleblowing advice charity, which offers free, confidential advice. ACAS can also provide guidance on workplace rights.

9. Confidentiality and anonymity

The College will treat all concerns in confidence and will make every effort to protect the identity of anyone who raises a concern and does not wish their name to be disclosed.

The identity of the individual will not be disclosed without their prior consent, save where the College is required to do so by law or where disclosure is unavoidable to enable a proper investigation — in which case the College will discuss this with the individual first wherever possible.

Confidentiality is distinct from anonymity: an anonymous report is one where the individual's identity is unknown to the College, whereas a confidential report is one where the College knows the individual's identity but protects it. Disclosure of information relating to a concern will be limited to those who have a legitimate need to know.

10. Protection from detriment and retaliation

The College prohibits any form of retaliation, victimisation or detriment against an individual who raises a genuine concern in good faith under this policy, or who supports or assists another person in doing so.

Detriment includes, but is not limited to, dismissal, disciplinary action, demotion, denial of opportunities, harassment, or any other unfavourable treatment.

This protection applies even if the concern later proves to be mistaken, provided it was raised honestly and in good faith.

Any individual found to have subjected a whistleblower to detriment, or to have deterred a person from raising a concern, will themselves be subject to disciplinary action, up to and including dismissal or expulsion.

Concerns about retaliation should be reported immediately through the routes in Section 7, and may also be pursued through the E6 Report and Support process where they relate to harassment, bullying, sexual misconduct or safeguarding.

11. Malicious, false or vexatious allegations

An individual who raises a concern honestly and reasonably will be protected even if the concern is not upheld. However, where an allegation is found to have been made maliciously, in bad faith, or for personal gain, or is known by the individual to be false, this may be treated as a disciplinary matter.

The making of a malicious or knowingly false allegation does not attract the protection of this policy.

12. Investigation process

On receipt of a concern, the recipient will acknowledge it promptly — normally within five working days.

The recipient (who has received the notification) will inform the Provost, or CEO who will determine how the matter should be investigated and by whom. In their absence, the Chief Academic Officer, or Director of Compliance, or Chief Operating Officer may be contacted by the to support the swift acknowledgement, and the staff who has received the complaint will hand over details of the initial investigation.

Investigations are conducted objectively, impartially and proportionately, and with confidentiality so far as possible.

A concern will normally be investigated by a designated investigating officer or panel, which may include a member of the senior leadership team, a Compliance representative, a HR representative;

where a concern relates to fraud, public funds or significant risk, the Audit and Risk Committee will be informed and may oversee the investigation.

Where a concern relates to a member of senior management or the governing body, arrangements will be made to ensure the investigation is independent of the individual concerned.

The College may, where appropriate, commission external or independent investigators.

The individual who raised the concern will be kept informed of progress and of the outcome so far as is possible without compromising confidentiality or the investigation.

Where an individual is dissatisfied with the handling of their concern, they may escalate it to the Chair of the Audit and Risk Committee or, where appropriate, to an external route under Section 8.

13. Bullying, harassment, sexual misconduct and safeguarding

Concerns relating to bullying, harassment, sexual misconduct, safeguarding and Prevent may also be reported through the E6 Report and Support area of the College website, accessible via Report & Support for Harassment & Sexual Misconduct, which sets out reporting routes, definitions, and internal and external sources of support.

Serious safeguarding concerns should be raised without delay with the Designated Safeguarding Lead via UKMC Safeguarding and Prevent Reporting Form or contacting Safeguarding@ukmc.ac.uk.

14. Support for those who raise concerns

Raising a concern can be stressful, and the College is committed to supporting individuals who do so. Support is available through the HR team, the College's Employee Assistance Programme and student-support services, the E6 Report and Support route, and externally through Protect (independent whistleblowing advice) and ACAS.

The College will not tolerate any harassment or victimisation of a whistleblower and will take active steps to protect those who raise concerns.

15. Roles, oversight, recording and reporting

15.1 Roles and responsibilities

All individuals are responsible for reporting concerns of which they become aware.

Managers are responsible for creating an environment in which staff and students feel able to raise concerns, for handling concerns sensitively, and for escalating them appropriately.

The Head of HR is responsible for initiating the operation of this policy and escalating to the Senior Leadership Team, such as the Provost or CEO, in order to swiftly acknowledge and begin investigating; the Director of of Quality and Compliance leads on concerns relating to regulatory compliance, fraud, public funds and data accuracy; and the Designated Safeguarding Lead handles safeguarding concerns.

15.2 Oversight and reporting

The College maintains a confidential record (whistleblowing register) of concerns raised, action taken and outcomes, used to identify themes and improve practice.

The Audit and Risk Committee receives a regular report on whistleblowing concerns — including, as a minimum, an annual summary — and provides oversight on behalf of the Board of Directors, with particular attention to concerns relating to fraud, the use of public funds and significant institutional risk.

Concerns and outcomes that bear on the College's risk profile are reflected in the Institutional Risk Register and managed in line with the Risk Management Policy and Framework.

16. Relationship to other policies

This policy operates alongside, and should be read with, the Risk Management Policy and Framework (under which whistleblowing forms part of the College's control environment and fraud and public-funds arrangements), the Anti-Bribery and Corruption Policy, the Fraud and Public Funding arrangements and declaration, the Conflicts of Interest Policy, the Safeguarding and Prevent Policy, the Data Protection Policy, and the Disciplinary and Grievance Procedures. Together these documents form a coherent framework for integrity, the protection of public funds and the management of risk.

17. Training and awareness

The College will provide training and awareness activities to ensure that staff, students and other stakeholders understand this policy, how to raise a concern, and the protections available to them. Awareness of whistleblowing routes forms part of staff induction and is reinforced through ongoing communications. This policy is published on the College website and available in alternative formats on request.

18. Review and update

This Whistleblowing Policy is reviewed at least annually, and as necessary to ensure continued compliance with applicable laws, regulatory requirements and best practice.

The College is committed to fostering a culture of integrity, transparency and accountability, and encourages all individuals associated with the College to uphold these principles.

19. Definitions

Whistleblowing: the raising of a concern about suspected wrongdoing, malpractice or danger that affects others and is in the public interest, as distinct from a personal grievance.

Qualifying / protected disclosure: a disclosure of information which, under the Public Interest Disclosure Act 1998, the individual reasonably believes is made in the public interest and tends to show one of the categories of wrongdoing recognised by the Act.

Detriment: any unfavourable treatment of a person because they have made, or are believed to have made, a disclosure.

Prescribed person: a body or individual prescribed under PIDA to whom a protected disclosure may be made externally, such as the Office for Students for higher education matters.

Good faith: raising a concern honestly and with a reasonable belief in its substance, regardless of whether it is ultimately upheld.