

Whistleblowing Policy

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1. Introduction and Purpose

- 1.1. The UK School of Professional Studies (SPS) is committed to maintaining the highest standards of ethical conduct. This policy and procedure offer employees and workers (“staff”) a confidential mechanism for reporting genuine concerns regarding suspected bribery, violations of the law, or any other significant wrongdoing.
- 1.2. The purpose of this policy is to provide staff, contractors, delivery partners, and others working with us with a safe and reliable process for raising genuine concerns about suspected wrongdoing. This may include concerns relating to fraud, data integrity, safeguarding, breaches of Skills Bootcamp funding rules, unlawful activity, or other serious misconduct.
- 1.3. The Governing Body of SPS will robustly and objectively investigate disclosures of impropriety in good faith and without prejudice to their origin or credibility or to any patent falsehood within the substance of the disclosure.
- 1.4. This policy ensures that such disclosures can be made without fear of retaliatory action by SPS, and that they will be taken seriously by handled appropriately, and investigated fairly.

2. Scope

- 2.1. This policy applies to public interest disclosures made by
 - Employees (permanent, temporary, and fixed-term)
 - Contractors, associate trainers, agency staff, and consultants
 - Delivery partners and subcontractors
 - Volunteers and governors
 - Employers engaged in our Bootcamp programmes
 - Learners, where concerns relate to matters of public interest (e.g., safety, fraud, malpractice)
- 2.2. This policy is not intended for raising personal grievances, learner complaints, or employment-related issues that do not meet the threshold for whistleblowing. Such matters should be addressed through the SPS *Complaints Policy and Procedures* or employee grievance procedures.

3. What is Whistleblowing?

3.1. 'Whistleblowing' refers to the disclosure of activity taking place within a public or private organisation which may be deemed illegal, immoral, illicit, unsafe or fraudulent. This may include (without limitation):

- any criminal activity
- a breach of legal or regulatory obligation,
- academic or professional malpractice,
- unsafe working practices or environments,
- financial fraud, mismanagement or unsecured conflicts of interest,
- corruption and bribery,
- facilitating tax evasion,
- damage to the environment,
- unauthorised disclosure of confidential information,
- conduct likely to endanger SPS's reputational or financial integrity
- unaccountability or negligence which may lead to any of the above,
- the deliberate concealment of any of the above.

4. Legally Protected Disclosures

4.1. In the UK, whistleblowers are protected under the *Public Interest Disclosure Act (PIDA)* from any negative consequences that may arise as a result of making a disclosure where the whistleblower reasonably believes:

- that a criminal offence or breach of legal obligation has taken place, or will take place; and/or
- that the matter is in the public interest. This means it must affect others, for example the general public.

4.2. Any individual who raises a concern under this policy can expect the matter to be handled confidentially. Where possible and unless required by law, their identity will not be disclosed to any individual implicated in the suspected wrongdoing without their prior agreement. SPS will take all reasonable steps to ensure that any reports, recommendations, or related documentation do not reveal the identity of the individual making the disclosure without their written consent, unless disclosure is legally required or necessary for obtaining legal advice.

4.3. No individual will face disciplinary action for making a disclosure in good faith under this policy. This protection does not extend to disclosures made

maliciously, vexatiously, or without reasonable grounds, and in such cases SPS may take appropriate disciplinary action.

4.4. SPS is committed to ensuring that no individual is subjected to dismissal, detriment, victimisation, or any form of undue pressure as a result of raising a genuine concern. Likewise, any individual who threatens, bullies, or subjects a colleague to detriment for making a disclosure will be subject to disciplinary action.

4.5. Where in doubt, you should seek external advice:

PROTECT are an independent whistleblowing charity who can offer confidential advice about whistleblowing. Please see further information on their website or by contacting their free helpline on:

020 3117 2520.

5. Responsibilities

5.1. The Governing Body of SPS responsibility for:

- Providing clear, safe, and accessible reporting routes for raising concerns.
- Ensuring all disclosures are handled promptly, fairly, and in accordance with this policy.
- Taking reasonable steps to investigate concerns thoroughly and objectively.
- Protecting individuals who raise concerns in good faith from victimisation, retaliation, or any form of detrimental treatment.
- Ensuring confidentiality is maintained wherever possible and appropriate.
- Promoting a culture of openness, integrity, and accountability across all Skills Bootcamp and wider activities.

5.2. Staff, Contractors, Learners and Associates are responsible for:

- Reporting genuine concerns about suspected wrongdoing as soon as possible.
- Acting honestly, professionally, and in accordance with legal and ethical standards.
- Supporting a culture where concerns can be raised without fear.

- Ensuring that any information provided is accurate to the best of their knowledge.
- Cooperating fully with investigations when requested

5.3. **Leaders and Managers** are responsible for:

- Receiving disclosures sensitively.
- Ensuring concerns are escalated in line with this policy and not dismissed or ignored.
- Maintaining confidentiality and protecting the individual who raised the concern.
- Supporting individuals through the process and promoting an open, safe reporting culture.
- Ensuring no detriment comes to anyone making a protected disclosure.
- Taking immediate action if any form of victimisation or retaliation is identified.

6. **Process for Making a Disclosure**

- 6.1. Disclosures should (if possible) be made in writing, making clear that this is being done within the terms of this Policy. The whistleblower should include the nature of the alleged wrongdoing and how it relates to the public interest. The background and all relevant evidence should be included.

If you are an employee of SPS

- 6.2. Any concern about a workplace situation should be raised in the first instance with your immediate Manager or Programme Leader. If the matter cannot be dealt with by this person, or the matter concerns them, then it should be raised with the Human Resources Team or the Dean.
- 6.3. If none of the above parties are suitable, the matter should be addressed directly to the Head of FE. If you cannot raise the matter with the Head of FE, then you should contact the [prescribed external person or body](#).
- 6.4. Personal grievances (for example bullying, harassment or discrimination) are not covered by whistleblowing law, unless a particular case is in the public interest. Otherwise, these matters should be reported using the grievance procedures

IF you are a learner or a member of the public

- 6.5. Concerns would normally be raised and dealt with through the *Complaints Policy and Procedures*, however this may not be possible where there the alleged wrongdoing is as described in 3.1. If you cannot use the complaints procedure, you can speak to any trusted person within SPS' management team, including
- A trainer/lecturer
 - A Programme Manager
 - The Complaints Officer complaints@schoolofprofessionalstudies.co.uk

F.A.O Complaints Officer (UK School of Professional Studies)

School of Professional Studies

Simpson House

6 Cherry Orchard Rd, Croydon, CR0 6BA

- 6.6. If none of the above parties are suitable, the matter should be addressed directly to the Dean:

F.A.O Dean (UK School of Professional Studies)

School of Professional Studies

Simpson House

6 Cherry Orchard Rd, Croydon, CR0 6BA

- 6.7. The recipient of the disclosure shall bring it to the attention of the Chair of the Governing Body.
- 6.8. If for any reason the matter cannot be dealt with by SPS' governing body, the discloser should contact the [prescribed external person or body](#) as relevant to the nature of the matter which may be:
- **Ofqual:** For concerns specifically relating to the SPS' compliance with vocational qualification rules (e.g., integrity of assessment or certification).
 - **The Department for Education:** complaints about the quality of learning opportunities offered by SPS or concerns related to public funding, financial irregularity, or governance (disclosures about higher education programmes may also be referred to the **Office for Students**)
 - **Health and Safety Executive (HSE):** For concerns about health and safety failures.
 - **The Police:** For concerns involving criminal activity.

- 6.9. Where the matter relates to the academic integrity of a taught programme, an external disclosure may also be made to that programme's awarding body.

Anonymity

- 6.10. We will make every effort to protect the identity of those seeking to make a disclosure in confidence. If it is necessary for anyone investigating the concern to know the discloser's identity, SPS will discuss this with the whistleblower first.
- 6.11. Whilst we take all concerns seriously at the point of disclosure, we do not encourage whistleblowers to make disclosures anonymously as proper investigation may be more difficult or impossible if we cannot obtain further information. It is also more difficult to establish whether any allegations are credible.
- 6.12. There is no time limit to making a disclosure. A disclosure may be made about an incident that happened in the past, is happening now, or is reasonably believed will happen in the near future.

7. External Notifications and Reportable Events

- 7.1. Where required, SPS will notify a concern raised through this procedure to the appropriate external body or enforcement agency (including those listed in 6.8) within any specified timeframe or as soon as possible.
- 7.2. SPS will additionally notify the course's awarding or accrediting body in accordance with any stipulation in the relevant agreement.
- 7.3. Such a notification will include a summary of the nature of the event and the action taken or proposed by SPS to investigate it and any additional information required by that body.
- 7.4. Where the investigation concludes that a criminal offence (such as fraud or bribery), a serious financial irregularity involving public funds, or a breach of a statutory or regulatory duty has occurred, Governing Body will be obliged to report the matter to the Police/Serious Fraud Office (SFO) in addition to the prescribed regulator.
- 7.5. **Regarding Provision specifically relating to General London Authority (GLA) - funded Skills Bootcamps:**

Whistleblowing involves entering a 'whistleblowing' webform on the ['Contact the Department for Education' page](#), which can be found on Complaints procedure - Department for Education - GOV.UK. Whistleblowing entries for Skills Bootcamps must be clearly marked as 'Skills Bootcamps' and will submit via the DfE's whistleblowing submission process and will be escalated to the relevant policy team. Please also copy in skillsbootcamps@london.gov.uk

8. Process for investigating a disclosure

8.1. Where disclosures are received and escalated internally, the following shall apply:

The person receiving the disclosure shall seek to get as much information about the matter as possible and then escalate it to the Chair of the Governing Body without undue delay; the Chair of the Governing Body will consider the substance of the disclosure and will then:

- initiate an investigation in accordance with the appropriate policy; or
- initiate an ad-hoc investigation where the nature of the disclosure falls outside of SPSs policies and procedural frameworks; or
- refer the matter to the appropriate external authority (such as the police) ; or
- take no further action if upon examination the concern is found to be without merit (for example where an allegation is demonstrably malicious or false).

8.2. When planning a formal investigation, the Chair of the Governing Body may appoint an investigator who may be a member of staff with relevant experience of or specialist knowledge of the matter. The investigator will prepare a report for a special committee of inquiry, which may include an assessment of any institutional failings which have allowed the alleged wrongdoing to take place, and recommendations for remedial action.

8.3. The whistleblower shall be informed of the action taken and may be given the opportunity to contribute to any investigation or to comment on a decision not to take action. However, there may be a need to protect the confidentiality of other parties, for example where there has been an investigation and disciplinary action.

8.4. Where an internal investigation is undertaken, the outcome will be reported to the Designated Person, who will consider what further action to take. This may include referral under the relevant disciplinary procedures.

- 8.5. The Designated Person may also seek advice on whether the matter must be reported to any external public, statutory or regulatory body, and shall act accordingly.
- 8.6. If the whistleblower is dissatisfied with the action taken, or lack thereof in response to their disclosure, they may raise this with the Chair of the Governing Body.
- 8.7. Where the outcome of an internal review has been communicated to the whistleblower, and they feel that the cause for concern remains, they should raise this with the [prescribed external person or body](#).
- 8.8. SPS will duly comply with any investigation or direction by a recognised external statutory or regulatory authority acting in response to a public interest disclosure.

9. Awareness of Policy

- 9.1. SPS will ensure that the employees and learners are aware of these whistleblowing procedures and how to differentiate normal complaints from matters that are in the public interest:
- 9.2. Learners will receive information in their induction materials about their right to complaint or make whistleblowing disclosure to SPS and the appropriate external bodies/agencies.
- 9.3. This policy will be highlighted to employees in their employee handbook.

Appendix A: Statement on Protection for the Whistleblower (The Discloser)

SPS is committed to ensuring that anyone who raises a genuine concern under this policy, in the reasonable belief that the disclosure is in the public interest, will not be subjected to any form of detriment or victimisation.

Protection from Detriment

- **Zero Tolerance:** SPS adopts a zero-tolerance approach to the harassment, intimidation, or victimisation of any individual who makes a protected disclosure. This applies regardless of the eventual outcome of the investigation.
- **Legal Protection:** Any attempt to penalise, harass, or detrimentally affect a discloser (e.g., through demotion, transfer, loss of pay, or exclusion from learning activities) will be treated as a serious disciplinary matter, potentially leading to immediate disciplinary action against the perpetrator, up to and including termination of employment or enrolment.
- **Support:** Where a discloser is found to have suffered detriment as a result of their disclosure, SPS will take all reasonable steps to restore the discloser's position.

Confidentiality and Anonymity

- **Confidentiality Pledge:** The identity of the discloser will be kept strictly confidential and will only be shared with those individuals absolutely necessary for the purpose of a fair and thorough investigation.
- **Anonymous Disclosures:** SPS prefers that concerns are raised openly to facilitate effective investigation. However, the School will consider anonymous disclosures, but acknowledges that effective investigation may be severely limited if the investigator cannot seek clarification or additional evidence from the source. Anonymous disclosures will be assessed against the seriousness and clarity of the information provided.
- **Requirement to Disclose Identity:** The discloser will be informed if, exceptionally, their identity needs to be revealed (e.g., due to legal requirements, or if the concern involves a formal grievance process where the discloser must provide evidence). The investigation will not proceed without the discloser's explicit consent in such circumstances.

Protection Against Malice

This protection does not extend to disclosures made maliciously. If a discloser knowingly provides information they know to be false, or acts solely for personal gain, they will not be protected under this policy and may face disciplinary action under SPS' relevant staff or student disciplinary procedures.

Version History

Version	Changes	Date	Approved by:
0.1	Draft		
1.0	First approved version – designation of internal persons. Addition of Statement on Protection for the Whistleblower	July 2025	Governing Body