



Whistleblowing Policy and Procedure

2026

Alison Buick

Review Date: May 2026

Next Review Date: May 2027

1. Introduction

1.1 City of Wolverhampton College (“the College”) is committed to the highest standards of openness, probity and accountability. This policy enables workers to raise concerns about wrongdoing in the public interest and reflects current statutory guidance and sector best practice for further education colleges in England, including Department for Education whistleblowing guidance for post-16 providers updated in March 2026.

1.2 This policy is designed to comply with the **Public Interest Disclosure Act 1998 (PIDA)** as incorporated into the Employment Rights Act 1996 and takes account of recent legislative updates to the prescribed persons regime introduced in June 2025.

1.3 The College encourages concerns to be raised at the earliest opportunity and provides assurance that individuals who speak up will be supported and protected from retaliation.

2. Scope and Who This Policy Applies To

2.1 This policy applies to **workers**, which for the purposes of whistleblowing law includes:

- employees (permanent, temporary and fixed-term)
- agency workers and apprentices
- casual workers, partners and contractors engaged personally to provide services

This reflects current ACAS guidance on who is protected under whistleblowing law.

2.2 Volunteers, learners and governors are not automatically protected by PIDA but may still raise concerns under this policy. The College will treat such disclosures seriously, although statutory whistleblowing protections may not apply.

2.3 Learners should normally raise concerns through the College Complaints Procedure unless the matter relates to serious wrongdoing in the public interest.

3. What Is Whistleblowing?

3.1 Whistleblowing is the reporting of suspected wrongdoing that is in the **public interest**. It does not include personal employment grievances, which should be raised under the Grievance Procedure.

3.2 A disclosure qualifies for protection where the worker reasonably believes the information tends to show one or more of the following:

- a criminal offence
- failure to comply with a legal obligation
- miscarriage of justice
- danger to health or safety
- damage to the environment
- deliberate concealment of any of the above

This reflects the statutory definition set out in PIDA and current government guidance.

4. Safeguarding and Child Protection

4.1 Concerns relating to safeguarding or child protection must be raised immediately and may also fall under statutory safeguarding duties.

4.2 Staff who feel unable to raise safeguarding concerns internally may contact the **NSPCC Whistleblowing Helpline** or report directly to the Department for Education, in line with current DfE guidance for colleges.

5. How to Raise a Concern Internally

5.1 Disclosures should normally be made to the **Head of Governance**, who is the College's Designated Whistleblowing Officer. This is currently Alison Buick buicka@wolvcoll.ac.uk

5.2 Where the concern relates to the Head of Governance, it should be raised with the **Chair of the Board of Governors**. Where the Chair or Vice Chair may be implicated, the concern should be raised with the **Chair of the Audit Committee**.

5.3 Disclosures may be made verbally or in writing. Workers are encouraged to identify themselves, as this assists investigation, but anonymous disclosures will be considered in line with section 5.4.

5.4 Anonymous disclosures will be assessed having regard to:

- the seriousness of the issue
 - the credibility of the concern
 - the likelihood of confirming the concern from other sources
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6. Investigation and Response

6.1 All disclosures will be acknowledged in writing within ten working days.

6.2 The College will assess whether the concern warrants investigation and may:

- conduct an internal investigation
- refer the matter to auditors
- refer to external regulators or authorities, including the Department for Education or other prescribed persons

6.3 Investigations will be carried out promptly and objectively by an individual independent of the matter raised.

6.4 The whistleblower will be kept informed of progress and outcome, subject to legal and confidentiality constraints.

7. Protection and Support for Whistleblowers

7.1 Workers who make a protected disclosure will not suffer dismissal or any detriment, including bullying or harassment by colleagues. Detriment by co-workers is expressly covered by current whistleblowing protections.

7.2 Any victimisation of a whistleblower will be treated as a disciplinary matter.

7.3 Protection does not apply where a disclosure is made maliciously or knowingly false.

7.4 Confidential advice is available from the independent charity **Protect**, the UK's whistleblowing advice body for the education sector.

8. External Disclosures

8.1 Workers may make disclosures to external **prescribed persons** where appropriate. For further education colleges, relevant bodies may include:

- Department for Education
- Health and Safety Executive
- Information Commissioner's Office
- Charity Commission (as FE corporations are exempt charities)

The list of prescribed persons is maintained by government and was updated in 2025 to reflect new regulatory responsibilities.

8.2 Workers may also seek confidential legal advice from a solicitor or barrister.

9. Governance and Oversight

9.1 A confidential record of all whistleblowing disclosures will be maintained.

9.2 An annual anonymised report will be provided to the **Audit Committee**, in line with good governance practice for FE corporations.

10. Equality and Fair Treatment

10.1 The College is committed to ensuring that this policy is applied fairly and without discrimination.

10.2 Reasonable adjustments will be made to support individuals with protected characteristics in raising concerns.

11. Further Support

- **Employee Assistance Programme** – confidential wellbeing support
 - **Protect Advice Line:** 020 3117 2520 | <https://protect-advice.org.uk>
 - **NSPCC Whistleblowing Helpline:** 0800 028 0285
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Appendix A: Grievance vs Whistleblowing

A grievance relates to an individual's personal employment situation. Whistleblowing relates to wrongdoing affecting others or the public interest. This distinction reflects current ACAS and government guidance.

Difference between a personal grievance and a whistleblowing complaint:

A grievance will concern an employee personally, i.e. the individual may have a complaint about:

- Pay or working hours
- The amount of work that he or she is expected to do
- Working conditions, or
- Being bullied by fellow workers.

A protected disclosure will concern the conduct of another person in the workplace (whether or not that conduct affects the discloser personally), in circumstances where the discloser genuinely believes that the conduct in question amounts to a criminal offence, a breach of a legal obligation, or something likely to endanger health or safety or illegally damage the environment.

Examples of the difference between a grievance and a protected disclosure:

Grievance

- An employee's complaint about the type of work that he or she is being asked to do, for example if it is not covered by his or her contract
- An employee's complaint that he or she has received insufficient safety training
- An employee's complaint about the hours that he or she is expected to work

A Protected disclosure

- A disclosure that an individual has been instructed to carry out actions that he or she genuinely believes to be illegal e.g., to falsify a tax return
- A disclosure that safety rules within the workplace are routinely being flouted, thus endangering safety
- A disclosure that the requirements imposed by the company on a group of staff represent a breach of the working time legislation.