The Westminster
Specialist College

2025/2026
Whistleblowing Policy

Approved by Board of Governors on:	**8/7/2025**
Signed by Chair of Governors:	P Coldicott
Head of College:	O Flowers
Lead Personnel:	O Flowers
Date of Review:	**8/7/2026**

The Westminster Specialist College is committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards.

However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.

The aims of this policy are:

- To encourage all staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously, investigated as appropriate, and that their confidentiality will be respected.
- To provide staff with guidance as to how to raise those concerns.
- To reassure staff that they should be able to raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken.

Who is covered by this policy?

This policy applies to all individuals working at all levels of the organisation, including senior managers, teachers, directors, support staff, employees, consultants, contractors, term-time, part-time and fixed-term workers, casual and agency staff, volunteers and anyone else working for or providing services to The Westminster Specialist College.

What is whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work.

This may include:

- Criminal activity, (for example, fraud, corruption or theft has been or is likely to be committed)
- Miscarriages of justice.
- Danger to health and safety to staff and/or learners.
- Damage to the environment.
- Failure to comply with any legal or professional obligation or regulatory requirements.
- Bribery.
- Financial fraud or mismanagement.
- Negligence.
- Breach of our internal policies and procedures.
- Conduct likely to damage our reputation.
- Unauthorised disclosure of confidential information.
- Where a learner is or an individual suspects a learner is at risk of harm, or may have been harmed.
- The deliberate concealment of any of the above matters.

Any issues relating to safeguarding learners should be raised under The Westminster Specialist College Safeguarding Policy.

A whistle-blower is a person who raises a genuine concern in good faith relating to any of the above. If an individual has any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) they should report it under this policy.

This policy should not be used for complaints relating to an individual's own personal circumstances. In those cases, individuals should use the College's grievance procedure.

Raising a whistleblowing concern

Individuals should initially raise any concerns with their line manager. They will be able to agree a way of resolving concerns quickly and effectively. In some cases, they may refer the matter to the Principal or board of governors.

A written and oral complaint should detail the background and history of the concern, (giving dates) and the reason why they are concerned about the situation.

However, where the matter is more serious, or if the individual feels that the line manager has not addressed their concern, or they prefer not to raise it with them for any reason, they should contact the Principal or Board of Governors.

A meeting will be organised as soon as possible to discuss the concern.

An indication of how the College proposes to deal with the matter will be given to the individual raising the concern.

Confidentiality

The College hopes that staff will feel able to voice whistleblowing concerns openly under this policy. However, if an individual wants to raise their concern confidentially, the College will make every effort to keep their identity secret. If it is necessary for anyone investigating the concern to know their identity, the College will discuss this with the individual.

Anonymous disclosures are not usually investigated but the College will exercise its discretion whether to investigate in these circumstances. Proper investigations may be more difficult or impossible if we cannot obtain further information from the individual. It is also more difficult to establish whether any allegations are credible and have been made in good faith. Whistle-blowers who are concerned about possible reprisals if their identity is revealed should come forward to their line manager, Principal or Board of Governors and appropriate measures can then be taken to preserve confidentiality.

External Disclosures

If a concern relates to a work placement site or a host employer involved in DFN Project SEARCH, whistleblowers are encouraged to first raise it with the College so that appropriate multi-agency protocols and safeguarding partnerships can be enacted.

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases the individual should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for an individual to report their concerns to an external body such as a regulator. It is not appropriate to alert the media. The College strongly encourages individuals to seek advice before reporting a concern externally. The independent whistleblowing charity, Protect – speak up – stop harm, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their website is https://protect-advice.org.uk/.

Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a parent, carer, learner, external supplier or service provider. The law allows individuals to raise a concern in good faith with a third party, where they reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, the College encourages individuals to report such concerns internally first, by contacting the Principal or Board of Governors for guidance.

Investigation and outcome

Once a concern has been raised, the College will carry out an initial assessment to determine the scope of any investigation. The College will inform individuals of the outcome of the initial assessment. Individuals may be required to provide further information.

In some cases, the College may appoint an independent investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

The person receiving the concern will keep the individual reporting the concern informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent the College revealing specific details of the investigation or any disciplinary action taken as a result. All information about the investigation should be treated as confidential.

Where appropriate, the matters raised may be referred to the police, an external regulatory body, or form the subject of an independent enquiry.

If the College concludes that a whistle-blower has made false allegations maliciously, in bad faith or with a view to personal gain, the whistle-blower will be subject to disciplinary action. Employees may also be subject to disciplinary action if they disclose confidential information externally in some circumstances.

If individuals are unhappy with the way in which their concern has been handled, they can raise it with the Board of Governors.

Protection and support for whistle-blowers

Support can include access to counselling, HR guidance, and reasonable adjustments to working environments if needed. The College maintains a non-retaliation policy and encourages open discussion to address any emerging risks or cultural issues.

It is understandable that whistle-blowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Employees must not suffer any detrimental treatment as a result of raising a concern in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment or informal pressure connected with raising a concern. If an individual believes that they have suffered any such treatment, they should inform their line manager immediately. If the matter is not resolved, they should raise it formally using the College's grievance procedure. Staff

must not threaten to retaliate against whistle-blowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

Review Date: 8/7/2026

Policy to be reviewed by: Ben Taylor