

BCC WHISTLEBLOWING POLICY

Policy created by:	Turcekova	UPDATES
Policy created date:	01/07/2019	<i>Policy created</i>
Reviewed: LT	01/07/2020	
Reviewed: LT	01/07/2021	
Reviewed: LT	01/07/2022	
Reviewed: LT	01/07/2023	
Reviewed: LT	01/07/2024	
Reviewed: LT	01/07/2025	
Reviewed: LT	01/01/2026	<i>Renewal of BC Accreditation</i>
Reviewed:	01/07/2027	
Reviewed:	01/07/2028	
Reviewed:	01/07/2029	

SUMMARY

Whistleblower protection in the UK is governed by the **Public Interest Disclosure Act 1998 (PIDA)**. This legislation ensures that employees who report **misconduct** can do so without fear of retaliation.

With the recent introduction of the Worker Protection Act, there are new responsibilities for employers to navigate. This legislation, effective from October 2024, requires businesses to take "reasonable steps" to prevent workplace harassment. The Worker Protection Act highlights the need for UK organisations to have a robust whistleblowing policy in place.

THE WORKER PROTECTION ACT AND HOW IT RELATES TO WHISTLEBLOWING POLICIES

Bournemouth City College understands that a well-rounded whistleblowing policy is more than a box-ticking exercise — it's the foundation of a transparent, healthy workplace culture.

From **October 2024**, under the new **Worker Protection Act**, policies must also cover harassment, ensuring that employees can confidently report issues such as discrimination or sexual harassment. Employers who don't take proactive steps could face increased fines, including higher compensation awards in employment tribunals.

When integrating both PIDA and the Worker Protection Act, a whistleblowing policy should clearly outline how employees can raise concerns, protect them from retaliation and ensure that complaints are dealt with promptly and confidentially. BCC understands the importance of regular training and communication on this policy, essential to foster an open and accountable environment.

To support your efforts to comply with UK law and foster an open, accountable workplace, BCC management has outlined key steps to creating a strong and effective whistleblowing policy.

WHISTLEBLOWING POLICY IN GENERAL

1. BCC Employees Understand whistleblowing and its importance

Whistleblowing refers to the **act of reporting wrongdoing, such as criminal activity, health and safety violations, environmental harm, or breaches of legal obligations**. A BCC Whistleblowing policy ensures employees can raise concerns confidentially and without fear of reprisals. The Public Interest Disclosure Act 1998 (PIDA) safeguards whistleblowers against unfair dismissal or detrimental treatment, provided the disclosure is made in good faith and the employee reasonably believes the information is true, BCC complies with the PIDA 1998, followed by updates in 2024.

2. Define whistleblowing

Definition of Whistleblowing states, based on the Government policy: “A whistleblowing policy in education is a mandatory framework (especially for maintained schools and academies in England) designed to protect staff who report wrongdoing—such as safeguarding failures, fraud, or health and safety risks “.

Private English language schools in the UK are legally required to protect staff who "blow the whistle" (report wrongdoing) under the **Public Interest Disclosure Act 1998 (PIDA)**. Staff are protected when reporting:

- criminal offences
- health and safety dangers
- environmental damage
- legal failures

BCC Management takes these areas very seriously and follows clear, transparent internal procedures to handle these reports securely.

Bournemouth City College wants to encourage a trusting and supportive environment for all our members such as employees, students, third – party agents and suppliers, stakeholders. BCC takes malpractice or misconduct seriously and is committed to a culture of openness, trust and respect in which every stakeholder can report legitimate concerns and be assured of protection against victimisation.

The BCC Code of Governance states that:

“There should be a documented whistle-blowing procedure for the members, workforce and stakeholders to raise concerns in confidence and – if they wish –anonymously. The board should routinely review the procedure and any concerns raised and ensure a policy is in place to ensure proportionate and independent investigation and follow up.”

BCC as a supporting employer will:

- We will listen to whistleblowing reports, treat them seriously, and try to resolve them as quickly as possible and learn from them so that we can continuously improve.
- To enable BCC to act quickly against any potential malpractice to ensure it conducts its business with the highest standards of integrity and honesty at all times;

- To identify risks that BCC may not know about;
- To remind all involved parties to speak out in confidence if they have concerns and to be assured that they do not need to provide evidence for their concerns to be raised;
- To raise awareness of the importance of preventing and eliminating wrongdoing at work.

3. Key Components of a BCC Whistleblowing Policy

- **Protection:** Protection against unfair treatment, harassment, or dismissal for raising concerns.
- **Confidentiality:** Procedures to keep the whistle blower's identity confidential.
- **Reporting Lines:** Clearly defined internal channels (e.g., reporting to a manager, designated safeguarding lead).
- **External Reporting:** Guidance on reporting to external bodies if internal channels are inappropriate such as the [Department for Education \(DfE\)](#) or professional bodies.

4. REPORTING CHANNELS

Any person that raises concerns under this policy can be assured that any matter raised will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the person who raised the concern.

The multiple channels are used to ensure accessibility, such as:

- Direct reports to a designated manager (Managing Director)
- Third-party reporting software, which offer confidentiality and support
- Anonymised reporting mechanisms

Ensure your reporting process is straightforward and encourage employees to come forward.

Highlight that disclosures can be made internally first, but they can also contact prescribed bodies if necessary

4. ENSURE CONFIDENTIALITY AND ANONYMITY

Employees are more likely to report concerns if they know their identities will be protected. Emphasise your commitment to maintaining confidentiality throughout the process. In some cases,

employees may want to remain anonymous. BCC respects that while anonymity is respected, it might limit feedback or investigation outcomes. Your whistleblowing system, such as Speak Up, should allow for anonymous reporting to protect employee identities.

In cases where employees don't feel comfortable reporting internally, they should have the option to contact prescribed persons or bodies, such as:

- 1) The Health and Safety Executive (HSE)
- 2) The Financial Conduct Authority (FCA)
- 3) For the businesses operating in the EU, the EU Whistleblowing Directive sets equivalent minimum standards for external reporting channels.

5. WHAT IS THE INVESTIGATION PROCEDURE FOR WHISTLEBLOWING?

What is the Procedure for Whistleblowing?

If you want to raise your concerns, you should speak or write to one of the following:

- The Managing Director of Bournemouth City College
- Governing Body Responsibility: In England, governing bodies must establish and update their whistleblowing procedure, usually aligning with the local authority model.
- Actionable Policies: It must be accessible to all staff, making it clear they do not need hard proof to report, only a "reasonable belief".
- External Advice: Employees can access guidance on GOV.UK or from the National Education Union.

You can raise your concerns anonymously but it may not be taken further if you do not provide all the information that is required. Alternatively, you can give your name but request confidentiality, and the person or body should make every effort to protect your identity.

WHAT WILL HAPPEN NEXT

- Your employer or the Prescribed Person or Body will listen to your concern and decide if any action is needed. You may be asked for further information.
- You must say straight away if you want to request confidentiality.
- You will not have a say in how your concern is dealt with.
- Your employer or the Prescribed Person or Body may keep you informed about the action they take, but will not reveal details that compromise the confidence of other people.

Your whistleblowing policy should include a clear explanation of how the company will investigate disclosures. Outline the steps, such as:

- Acknowledging receipt of the report within a specified timeframe (e.g., 48 hours)
- Conducting a thorough investigation led by a designated team
- Providing regular updates on the progress of the investigation
- Concluding with feedback to the whistleblower (while respecting confidentiality)

This structure will give employees confidence that their concerns will be taken seriously.

6. HIGHLIGHT PROTECTION AGAINST RETALIATION

One of the key elements of PIDA is the protection of whistleblowers against retaliation. Your policy should explicitly state that employees who report concerns will not face any detrimental treatment. This includes protection from:

- Unfair dismissal
- Demotion or loss of privileges
- Harassment or victimisation

Under PIDA, if an employee believes they have been treated unfairly after blowing the whistle, they can bring a claim to an Employment Tribunal.

7. SET CLEAR EXPECTATIONS ON BAD-FAITH DISCLOSURES

While encouraging whistleblowing, it's also essential to deter bad-faith or malicious disclosures. BCC explains that deliberate false reports or those made with malicious intent may lead to disciplinary action. This ensures that the policy is used responsibly while maintaining a fair and transparent culture.

8. PROVIDE GUIDANCE ON LEGAL AND REGULATORY COMPLIANCE

BCC explain how your policy complies with UK regulations. Each country has its own laws regarding whistleblowing. For businesses operating internationally, tailor your policy to ensure compliance with local laws where you operate. In the UK, PIDA sets the legal framework, but international offices may have different requirements.

10. REVIEW AND UPDATE THE POLICY REGULARLY

Whistleblowing laws and regulations evolve. It's important to regularly review and update your policy to ensure ongoing compliance with the latest legislation and best practices. Government reviews, such as the 2023 review of PIDA, may result in changes to the framework.

WHISTLEBLOWING SOFTWARE AND ITS ROLE IN SUPPORTING WHISTLEBLOWING POLICIES

A well-written whistleblowing policy is an essential starting point for fostering transparency, but it becomes more effective when paired with dedicated whistleblowing software. Solutions like SpeakUp offer an extra layer of security and anonymity for employees reporting wrongdoing. These platforms streamline the reporting process, provide anonymity options, and ensure that reports are handled promptly.

By integrating whistleblowing software into your policy, you reduce the risk of missed reports and make it easier for employees to speak up without fear. This technology also helps companies remain compliant by securely storing records of all reports and investigations, which is crucial during audits or legal reviews. BCC will be implementing the whistleblowing software due to course.

