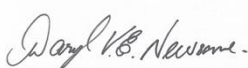


Author: HR Project Manager	Last Review Date: September 2025
Responsible Person: Daryl Newsome Chair of Trustees	New Review Date: August 2027
Version: 2	Signature: 

1. POLICY STATEMENT

ABDO College is committed to the highest standards of ethical practice, behaviour and integrity among its employees and students. Where anyone has concerns we hope that these can be easily resolved. ABDO College encourages employees to speak up and report any genuine concerns of wrongdoing. As speaking up and raising concerns can be difficult, this policy provides guidance to enable employees to do so and a commitment to ensuring that individuals are not adversely affected as a result of reporting concerns.

1.1 The Public Interest Disclosure Act legal protections apply to employees and workers. All employees including permanent staff, contractors, guest lecturers, shared services and trustees are expected to act within the remit of this policy statement, regardless of any protected characteristics.

1.2 **Students** are encouraged to raise any concerns through their representatives via the *Student Voice Committee* or, if more appropriate, the [ABDO College Complaints Policy](#). Should a **member of the public** have a genuine concern then this should be raised with the Principal. **Employers** who have a concern should raise this with the Apprenticeship Manager (for apprenticeships) or the Head of Operations for non-apprenticeship matters. If an employer feels it more appropriate, then concerns can be addressed directly to the Principal.

1.3 This policy has been designed to ensure that no-one receives less favourable treatment due to the protected characteristics of age, disability, gender (including gender identity), ethnicity and race, religion or belief, sexual orientation, marriage and civil partnership, pregnancy and maternity and social and economic background.

2. PURPOSE

This policy's purpose is:

- i. To encourage employees to speak up and report suspected serious wrongdoing as soon as possible in the knowledge that their concerns will be taken seriously and investigated as appropriate;

- ii. To provide individuals with guidance as to how to speak up and raise those concerns, including how to raise concerns anonymously;
- iii. To provide a transparent and confidential process for dealing with concerns;
- iv. To ensure individuals are aware that they are able to raise genuine concerns without fear of reprisal, even if they turn out to be mistaken;
- v. To support ABDO College's zero tolerance approach to dishonest behaviour, malpractice and misconduct including fraud, bribery and corruption as set out in the College's policy against bribery and fraud.

3. WHAT IS WHISTLEBLOWING?

3.1. Whistleblowing is the disclosure of information, which relates to suspected wrongdoing or dangers relating to the running of ABDO College or to the work-related activities of employees. **These disclosures must be in the public interest.** Whistleblowing is also commonly known as 'speaking up'.

3.2. Wrongdoing may include, but is not limited to, information relating to:

- a criminal offence;
- failure to comply with legal obligations;
- failure to comply with ABDO College policies, regulations and codes of practice, financial or non-financial maladministration or malpractice or impropriety or fraud;
- academic or professional malpractice (including, for instance, violation of intellectual property rights, failure of integrity, or other academic misconduct);
- a risk to the health or safety of any individual;
- environmental damage;
- a miscarriage of justice;
- attempts to suppress or conceal any information relating to any of the above.

The Whistleblowing Policy is not meant to be another mechanism for employees to raise collective or personal grievances. The Grievance Procedure is in place to enable employees to lodge a concern relating to their employment. The Whistleblowing Policy is intended to cover major concerns that fall outside the scope of other procedures.

3.3. A whistleblower is a person who raises a genuine serious concern relating to any of the above categories of wrongdoing. The whistleblower may or may not be directly affected by the matter but the matter must also affect others.

3.4. If an individual is uncertain whether something is within the scope of this Policy, they should seek advice from the Principal whose contact details are at section 10. They may also contact Protect, which is an independent whistleblowing charity which operates an advice hotline.

3.5. All disclosures should be made with the view that it is in the public interest. This means that any such disclosure must affect others, for example, the general public or other members of staff.

3.6. Concerns that are not of a public interest nature, or those which fall into an area covered by another procedure, will not be considered under this Policy. Any such concerns may be considered under other ABDO College policies and procedures. For example, where the concerns relate to academic integrity or academic misconduct the investigation shall be conducted in accordance with the academic integrity and misconduct policy. Allegations of Fraud and Bribery shall be investigated in accordance with ABDO Colleges' anti-bribery policy.

3.7. Complaints that relate to a personal grievance are not covered by whistleblowing law. Employee grievances can be addressed through ABDO College's grievance procedures.

3.8. For the avoidance of doubt, this Policy cannot be used in order to re-open or review a matter that is currently, or has already been decided, under one of ABDO College's other procedures.

3.9. All UK employees are protected under the Public Interest Disclosure Act 1998.

3.10. This Policy provides an internal process for reporting, investigating and remedying any suspected wrongdoing at ABDO College. As such, while it is accepted that in some circumstances it may be appropriate to report concerns to an external body, such as a regulator, ABDO College recommends that the internal process be used in the first instance. Any concerns regarding a GOC registrant's fitness to practise, who is also a College member, should be raised to the College first. The College will follow the GOC's published procedure and guidance in investigating any matters. However, please note that if external disclosure is necessary, the independent whistleblowing charity, Protect, operates a confidential helpline and also provides a list of prescribed regulators for reporting concerns.

3.11. Whistleblowing or speaking up can sometimes relate to the actions of a third party, such as a supplier or service provider. The law allows employees to raise a concern with a third party, where they reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, ABDO College encourages reporting of such concerns internally first. Advice and guidance can be sought from the contacts listed in section 10.

4. MAKING A DISCLOSURE

4.1. Any individual as defined in paragraph 1.1 may raise a concern. Although not required, it can be helpful if the individual can state how they believe their concern to be in the public interest to state, the type of wrongdoing being reported (3.2) and provide supporting evidence.

4.2. Disclosures can be made directly with their Head of Department or Programme/Course Lead in writing or in person at a face-to-face meeting. Where reports are raised with line managers they should be referred to the relevant Head of Department or Programme/Course Lead. The person notified will aim to resolve the concern quickly and effectively or will refer the matter to the Principal.

4.3. Where the matter is more serious, where the individual feels that the person that they notified has not addressed their concern, or they prefer not to raise it with their Head of Department or Programme/Course Lead for any reason, they should raise the concerns verbally (in person or by phone) or in writing with the Principal, unless the Principal is the subject of the concern or is in some way implicated in it (in which case paragraph 4.7 applies).

4.4. The person notified will aim to resolve the concern quickly and effectively or will refer the matter to the Principal, or the Chief Executive Officer if the concerns relate to the Principal, on behalf of the reporting individual.

4.5. Individuals making a disclosure may be supported by a colleague.

4.6. Heads of Department and Programme/Course Lead, who receive reports may seek advice and guidance from HR jbrown@abdocollege.org.uk

4.7. Where a concern relates to the Principal, the reporting individual may refer the matter to the Chief Executive Officer. If the reporting individual considers it inappropriate to raise the concern with either the Principal or the Chief Executive Officer, they may refer the matter to the Chair of the Trustees.

4.8. All contact details are at section 10.

5. INVESTIGATION AND OUTCOME

5.1. In all cases where a concern is raised under section 4, the person to whom the concern is reported will acknowledge its receipt within 5 working days and keep a record of action taken. This will include an initial assessment to determine the scope of any investigation.

5.2. If, on preliminary examination, the concern is judged to be wholly without substance or merit and no further action will be taken, or if the concern should be

considered under a different ABDO College procedure, the whistleblower will be informed accordingly.

5.3. Where appropriate the matter may be referred for investigation under the relevant ABDO College policy, grievance or disciplinary procedure.

5.4. The relevant person outlined in 4.3 may appoint another person to undertake the investigation on their behalf. Where there is an investigation, the person or persons identified as the subject of the concern will be informed of each allegation made against them and any evidence supporting it and will be allowed to comment before the investigation is concluded.

5.5. The Principal/Chief Executive Officer/ Chair of Board of Trustees will acknowledge the report within 5 working days and will keep the whistleblower informed of who is handling the matter, the progress of the investigation and its likely timescale. Timescales can vary greatly depending on the nature of the concerns, however the investigation should normally be completed and the outcome reported within three months of the disclosure.

5.6. The Principal/Chief Executive Officer /Chair of Board of Trustees will consider the need for confidentiality, keeping the details of the reporter or details of the report private. The need for confidentiality may limit the provision of specific details of the investigation or any actions taken as a result. The whistleblower and those who contribute to the investigation should treat any information about the investigation as confidential.

5.7. Upon the conclusion of an investigation, the Principal/Chief Executive Officer/ Chair of Board of Trustees will let the whistleblower know the outcome. The Principal/Chief Executive Officer/Chair of Board of Trustees is also responsible for the submission of a report to the Finance Committee. The Finance Committee must also be made aware of any concerns dismissed after preliminary examination

6. IF THE WHISTLEBLOWER IS NOT SATISFIED

6.1. If the whistleblower is not satisfied with the way in which their concern has been handled because either:

- a. They believe the procedures have not been followed properly;
- b. There is evidence of prejudice or bias; or
- c. There is further material evidence which was not available at the time the original concerns were raised;
- d. or the decision reached was unreasonable in their view;

6.2. There is a right of appeal within four weeks of receiving the outcome on these grounds only to the Chief Executive Officer, or if the allegation relates to the Chief Executive Officer, to the Chair of Board of Trustees.

6.3. The Chief Executive Officer, (or the Chair of the Board of Trustees) will decide if the case meets the grounds for appeal (as set out above). If it does, they will appoint a Finance Committee Member to hear the appeal. If the appeal does not meet more than one of the grounds for appeal it can be dismissed. Where the Chief Executive Officer has a conflict of interest, they shall nominate a relevant person to decide if the case meets the grounds for appeal.

6.4. The Chief Executive Officer (or the Board of Trustees or the Finance Committee Member) will let the whistleblower know the outcome of the appeal. The Chief Executive Officer (or the Chair of Board of Trustees) is also responsible for the submission of a report to the Finance Committee. The Finance Committee must also be made aware of any appeals dismissed after preliminary examination.

7. CONFIDENTIALITY AND ANONYMITY

7.1. ABDO College hopes that individuals will feel able to speak up and voice whistleblowing concerns openly under this Policy. It is helpful for ABDO College to know the identity of the whistleblower in order to conduct a fair and effective investigation.

7.2. ABDO College will protect all whistleblowers' confidentiality ensuring that a minimum number of people are aware of the reporter's identity, with prior consent. Failure to maintain confidentiality could result in disciplinary action. Confidentiality cannot be assured where the disclosure of the identity is required by law, for example in relation to criminal offences.

7.3. In all instances, anonymous complaints will be investigated or acted upon under this procedure, as the person receiving the complaint sees as reasonably practicable. Please note that investigating anonymous concerns is far more difficult and the scope of the investigation will depend on the seriousness of the issue raised, the credibility of the complaint, the prospects of being able to investigate the matter, and fairness to any individual mentioned in the complaint. We therefore would encourage non-anonymised complaints so we can investigate thoroughly.

7.4. For further independent advice, employees can seek advice from Protect, the independent whistleblowing charity, which offers a confidential helpline. Their contact details are at the end of this Policy.

7.5. Data stored on individuals is compliant with General Data Protection Regulations (GDPR). Further information on the data that is held can be found in ABDO College's Information Asset Register. All queries should be directed to Head of Operations.

8. PROTECTION FOR WHISTLEBLOWERS

8.1. It is understandable that whistleblowers are sometimes worried about possible repercussions. As such, ABDO College aims to encourage openness and will support employees who raise genuine concerns under this Policy, even if they turn out to be mistaken.

8.2. ABDO College has a zero tolerance approach to the misuse of this policy. If ABDO College concludes that an individual has made malicious allegations, in bad faith or with a view to personal gain, that individual will be subject to disciplinary action under ABDO College's relevant procedure. The person appointed to investigate the issue will indicate if they feel a complaint has been made maliciously, in bad faith or with a view to personal gain.

8.3. Employees must not suffer any detrimental treatment as a result of raising a concern without malice, reasonably believing it to be true. Detrimental treatment includes but is not limited to dismissal, disciplinary action, victimisation, threats, attempts to identify a whistleblower or other unfavourable treatment connected with raising a concern. Whistleblowers who believe they have suffered any such treatment, are encouraged to inform the relevant contact (listed in section 10) immediately. If the detrimental treatment is not remedied, the whistleblower should raise it formally using the relevant grievance or disciplinary procedure.

8.4. ABDO College has a zero tolerance approach to victimisation of whistleblowers. Employees must not threaten, victimise or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

8.5 An employee making a disclosure may want to confidentially request counselling or other support. Any request for counselling or support services should be made to the HR Manager, in confidence.

8.6 ABDO College has a responsibility to ensure that employees against whom concerns are raised are treated fairly, as any allegation made under this policy is a serious matter. ABDO College will take all reasonable steps to provide protection, as necessary. Employees may want to confidentially request counselling or support. Any request for counselling or support services should be made to the HR Manager, in confidence. This will apply to alleged perpetrators and/or those who may be required to give evidence.

9. OVERSIGHT AND OWNERSHIP

9.1. The ABDO College Senior Management Team has overall responsibility for this Policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this Policy. The Finance Committee support the Management Team with monitoring the Policy.

9.2. This Policy may be amended at any time and the latest version will be available via the Policies pages of the ABDO College website

10. CONTACTS

10.1. Contact addresses and numbers for those mentioned in the procedure are:

	Address	Telephone	Email
Principal	ABDO College, Godmersham Park, Godmersham, Canterbury, Kent, CT4 7DT		nmcdermott@abdocollege.org.uk
Head of Operations	ABDO College, Godmersham Park, Godmersham, Canterbury, Kent, CT4 7DT	01227 733 929	shertz@abdocollege.org.uk
HR Manager	ABDO, Godmersham Park, Godmersham, Canterbury, Kent, CT4 7DT	01227 286464	jbrown@abdo.org.uk
Chief Executive	ABDO, Godmersham Park, Godmersham, Canterbury, Kent, CT4 7DT	01227 733 911	abridge@abdo.org.uk
Chair of Board of Trustees	ABDO College, Godmersham Park, Godmersham, Canterbury, Kent, CT4 7DT		chairoftrustees@abdocollege.org.uk

ABDO College Speak Up (Whistleblowing) Policy



Protect (independent whistleblowing charity hotline)	The Green House 244-254 Cambridge Heath Road, London E2 9DA	020 3117 2520	whistle@protect-advice.org.uk or https://protectadvice.org.uk/co ntactprotect-advice-line/
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11. AGREEMENT TO FOLLOW THIS POLICY

The speak up policy is fully supported by the ABDO College Management and Board of Trustees and is regularly reviewed to incorporate feedback from employee and student representatives.