

Whistleblowing Policy & Procedure

For the attention of: All Staff

Produced by: Group Director of People

Approved by: Board of Governors

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Vision, Purpose & Values

Our Vision

Our students will be recognised locally & nationally for their positive impact on the communities and industries in which they choose to work.

Our Purpose

To inspire our students to gain the skills, knowledge and behaviours they need to be resilient and thrive in an ever-changing world.

Our Values

Excellence: A culture of creativity, high expectations, ambition and aspiration

Respect: Showing fairness, courtesy and mutual respect to each other and our environment

Integrity: Honesty, openness and trust at the heart of College life

Diversity: Celebrating diversity and inclusivity as a key to our success

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1. Introduction

- 1.1. The Windsor Forest College Group (The Group) is dedicated to ethical and principled operations. This policy guides employees and workers on how to report concerns related to bribery, legal breaches, and serious wrongdoings.
- 1.2. The Group encourages early reporting of concerns and provides safeguards for staff to report malpractice without fear of reprisals, even if the concerns prove to be unfounded. When in doubt, speak up.
- 1.3. This policy balances the need for transparency with protecting workers from unfounded allegations.
- 1.4. We uphold principles of accountability, aligning with the Bribery Act 2010 and Public Interest Disclosure Act 1998.
- 1.5. The Group recognises that disclosures relating to sexual harassment may, in some circumstances, fall within the scope of this policy where they raise issues of wider concern or public interest.

2. Applicability of This Policy & Procedure

- 2.1. This policy covers all employees, officers, consultants, contractors, volunteers, casual workers, and agency workers, collectively referred to as "workers." Learners should address concerns by making a complaint to the Group Vice Principal, Student Services.
- 2.2. Workers unsure whether to use this policy or the Group grievance procedure should seek confidential advice from their line manager or the HR Department.
- 2.3. All workers must watch for illegal or unethical conduct and report any such behaviour.
- 2.4. Managers hold the additional responsibility to ensure workers are aware of this policy, encourage an open culture, and guide workers in reporting concerns.

3. Protected Disclosures

- 3.1. The law protects workers making "protected disclosures" out of a sense of public duty.
- 3.2. To be a protected disclosure, the concern must relate to specific subject matter (see Section 4) and be made appropriately (see Section 5). The disclosure must

be made in the reasonable belief of the worker and in the public interest, consisting of information, not just allegations.

- 3.3. Disclosures relating to sexual harassment may qualify as protected disclosures under this policy where they are made in the public interest. This includes cases where a worker raises concerns about sexual harassment affecting others, systemic failings in the handling of such incidents, or behaviour creating an unsafe or hostile environment.

4. Specific Subject Matter

- 4.1. Workers must use this policy when they reasonably believe that they have information showing one or more of the following:

- A criminal offense has been, is being, or is likely to be committed.
- An individual has failed, is failing, or is likely to fail to comply with a legal obligation.
- A miscarriage of justice has occurred, is occurring, or is likely to occur.
- The health or safety of any individual has been, is being, or is likely to be endangered.
- Sexual harassment, or behaviour amounting to sexual harassment, has occurred, is occurring, or is likely to occur, particularly where it reflects systemic issues or poses wider risks to others.
- The environment has been, is being, or is likely to be damaged.

- 4.2. Information indicating any of the above is being, or is likely to be, deliberately concealed.

5. Procedure for Making a Disclosure

- 5.1. Workers should promptly disclose information to the Director of Governance, with transparency regarding any personal interest in the matter.
- 5.2. Contact the Director of Governance via email (tracy.reeve@windsor-forest.ac.uk) or phone (tel: 01628 824444).
- 5.3. Anonymous reports can impede the Groups ability to notify and investigate. The use of anonymity is determined by the gravity of the issue and the likelihood of obtaining verification from identifiable sources.

- 5.4. For further guidance, employees should confidentially contact the Group Director of People.

6. Procedure for Investigation of Disclosure

- 6.1. The Group designates the Director of Governance as the primary investigator to maintain separation from potentially implicated College departments. In some cases, an investigator(s) may be appointed.
- 6.2. Timescales vary based on the nature of the concern, with regular progress updates to the worker.
- 6.3. Recommendations are addressed to the CEO and Group Principal, who ensures their implementation unless there are valid reasons not to do so.
- 6.4. Workers usually receive notification of the outcome within a reasonable time. Confidentiality may limit specific details.
- 6.5. Workers not satisfied with the investigation's outcome can raise concerns confidentially with senior Group officials.
- 6.6. In some cases, the Group may deem the disclosure as lacking merit, with clear reasons provided to the worker.

7. Safeguards for Workers Making a Disclosure

- 7.1. Confidentiality is maintained for workers making disclosures, with name protection from alleged perpetrators.
- 7.2. Workers can expect confidentiality and non-disclosure without their prior consent.
- 7.3. Workers' identities are safeguarded, unless legally required or for legal advice.
- 7.4. Workers' who make a disclosure concerning sexual harassment are fully protected from victimisation or retaliation. The confidentiality of individuals making such disclosures will be maintained with the utmost care, and support will be offered through the HR Department and Employee Assistance Programme.
- 7.5. No disciplinary action is taken against a worker for making a disclosure under this policy. However, malicious, or groundless disclosures may result in disciplinary action.

- 7.6. No worker faces detrimental action for disclosing, and those threatening or victimising them are subject to disciplinary measures.
- 7.7. Instructions to cover up wrongdoing are a disciplinary offense. Workers should not remain silent when told not to raise or pursue concerns.

8. Disclosure to External Bodies

- 8.1. External reporting is considered after exhausting internal procedures. Workers are encouraged to seek advice before external reporting.
- 8.2. Reporting to external bodies, such as regulators, should be rare. The Group suggests contacting the CEO and Group Principal as the point of contact.

9. Accountability

- 9.1. The Group maintains records of concern, reporting to the Audit Committee and Board of Governors on an annual basis.

10. Further Assistance for Workers

- 10.1. Harassment or victimisation of workers making disclosures is not tolerated. Any such issues should be reported to the Group Director of People.
- 10.2. Retaliation against workers who speak out is not allowed.
- 10.3. Workers can request counselling or support from the Group's occupational health service.
- 10.4. The Employee Assistance Programme is available to workers.
- 10.5. Workers can contact the charity Protect (formerly Public Concern at Work) for confidential advice on whistleblowing issues.

Appendix 1: Making a Public Interest Disclosure Form

Making a Public Interest Disclosure (Whistleblowing)

This form is intended for use by any individual working for The Windsor Forest Colleges Group (including contractors, agency workers and volunteers) who wishes to raise an issue about wrongdoing.

This form should be used to report wrongdoing within the Group (for example, financial irregularities or health and safety concerns), rather than to raise a personal grievance (for example, if you wish to make an allegation of bullying or harassment, or are complaining that your contract of employment has been breached).

If you are unsure about whether your concerns are best dealt with under the Group's Whistleblowing policy or grievance procedure, please read the Group's Whistleblowing policy, which provides examples of the issues that should be reported using this form. If, having read the Whistleblowing policy, you remain unsure about which procedure to use, please consult the HR Department confidentially for further advice.

Once you have submitted this form, the Group's Whistleblowing procedure will be invoked. This will result in an investigation, which will not involve anyone (for example, your line manager) you may have implicated below.

In certain circumstances, you can request that your concerns be kept anonymous. Where possible, the Group will respect a request for anonymity but cannot guarantee that it will be able to do so.

This form should be completed and delivered to the Director of Governance in an envelope marked "confidential" or sent as an email attachment to Tracy Reeve with "confidential" in the subject line.

Formal public interest disclosure (whistleblowing)

Worker's name:	
Worker's job title:	
Workers department:	
Date:	
Does your public interest disclosure relate to your line manager?	Yes/No
Summary of disclosure:	
Please set out the details of the issue that you wish to raise, providing examples where possible, particularly dates, times, locations and the identities of those involved. You may attach additional sheets if required.	

Individuals involved:	
Please provide the names and contact details of any people involved in your concerns, including witnesses.	
Outcome requested:	
Please set out how you would like to see the issue dealt with, and why and how you believe that this will resolve the issue.	
Declaration:	
I confirm that the above statements are true to the best of my knowledge, information and belief. I understand that, if I knowingly make false allegations, this may result in the College taking disciplinary action against me.	
Form completed by:	
Signature:	
For completion by the Group:	
Date form received by the Director of Governance:	
Name of recipient and job role:	
Signature:	