

British Institute of Technology

WHISTLEBLOWING POLICY AND PROCEDURE, FREEDOM TO SPEAK UP AND PUBLIC INTEREST DISCLOSURE

Approved by: The Council

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Author: Legal Counsel

1. Purpose and Regulatory Context

The British Institute of Technology (“the Institute”) is committed to maintaining the highest standards of integrity, academic quality, governance, and public accountability. This Whistleblowing Policy supports that commitment and ensures compliance with:

- The Office for Students (OfS) regulatory framework, including expectations relating to effective governance, management, and student protection;
- The UK Quality Code for Higher Education, particularly principles relating to integrity, accountability, risk management, and safeguarding academic standards and the student academic experience;
- The Public Interest Disclosure Act 1998 (PIDA) and subsequent amendments;
- The principles of the Committee on Standards in Public Life (Nolan Principles).

This policy provides a safe, transparent, and effective mechanism for raising concerns where matters may pose risk to:

- students,
- academic standards and quality,
- public funds,
- legal or regulatory compliance,
- the Institute’s reputation and sustainability.

This policy does not form part of any contract of employment or student contract and may be amended by the Institute at any time.

2. Scope of the Policy

This policy applies to all members of the Institute community, including:

- Employees (permanent, fixed-term, casual);
- Agency workers, contractors, consultants, and those working under a contract for services;
- Students (including apprentices and placement students);
- Members of the Council and its committees.

The Institute recognises that fostering a culture of openness across staff and students is central to maintaining academic integrity and regulatory compliance.

3. Guiding Principles

The Institute adopts the following principles, consistent with OfS and UK Quality Code expectations:

- Openness and accountability: Concerns raised in good faith are welcomed and taken seriously.
- Protection from detriment: No individual will suffer victimisation, retaliation, or disadvantage for raising a legitimate concern.
- Public interest focus: Disclosures must be made with reasonable belief that the concern is in the public interest.
- Fairness and proportionality: Investigations will be conducted promptly, impartially, and confidentially.
- Academic integrity and student protection: Particular regard will be given to concerns that may impact academic standards, assessment integrity, safeguarding, or student welfare.
- Zero tolerance of concealment: Any attempt to suppress or conceal wrongdoing may itself constitute misconduct.

Malicious, vexatious, or knowingly false disclosures may result in disciplinary action.

4. What Constitutes a Whistleblowing Concern

A whistleblowing concern is a disclosure of information where the individual reasonably believes that one or more of the following has occurred, is occurring, or is likely to occur, and that disclosure is in the public interest:

- A criminal offence;
- Breach of legal or regulatory obligations (including OfS conditions of registration);
- Serious risks to health, safety, or safeguarding of students, staff, or others;
- Damage to the environment;
- Financial malpractice, fraud, bribery, or misuse of public funds;
- Serious breaches of academic governance, quality assurance, assessment integrity, or awarding standards;
- Systemic failure in student protection, complaints handling, or regulatory reporting;
- Deliberate concealment of any of the above.

5. Matters Outside the Scope of this Policy

This policy does not normally apply to:

- Personal employment grievances (e.g. contractual disputes), which should be raised under the staff grievance procedure;
- Student academic appeals, complaints, or misconduct matters that do not involve wider public interest issues;
- Matters better addressed through other Institute procedures unless they raise systemic or regulatory concerns.

Where there is uncertainty, advice should be sought from the Institute Secretary.

6. Protection, Support, and Confidentiality

6.1 Protection from Detriment

The Institute will take all reasonable steps to protect whistleblowers from:

- dismissal,
- disciplinary action,
- academic disadvantage,
- intimidation, harassment, or victimisation.

Any allegation of retaliation will be treated seriously and may lead to disciplinary action.

6.2 Confidentiality and Anonymity

- Disclosures may be made confidentially.
- The Institute will protect the whistleblower's identity wherever possible.
- Anonymous disclosures will be considered, but may limit the ability to investigate fully.

Individuals may seek confidential advice from Protect, the independent whistleblowing charity.

7. How and To Whom to Raise a Concern

Concerns should normally be raised with:

- Staff: Line Manager or Head of Department;
- Students: Personal Tutor or Head of Department;
- Council Members: Institute Secretary.

Where this is not appropriate, or the concern involves those listed above, disclosures should be made to:

- Institute Secretary, or
- Chair of the Audit Committee where the concern relates to the Institute Secretary.

Disclosures may be made verbally or in writing.

8. External Reporting and Regulatory Notification

The Institute encourages internal reporting in the first instance. However:

- Nothing in this policy prevents a worker from exercising statutory rights under PIDA.
- Certain matters (including serious financial irregularity, governance failure, or student protection risks) may require notification to the Office for Students or other regulators.
- Individuals are advised to seek independent or trade union advice before making external disclosures.

9. Investigation Process and Timescales

All disclosures will be assessed promptly and managed proportionately.

Indicative timescales:

Stage	Timescale
Acknowledgement	Within 5 working days
Initial decision on action	Within 20 working days
Outcome or progress update	Within 3 months

Investigations may be conducted internally or externally, depending on the nature of the concern. Those implicated will be treated fairly and given an opportunity to respond.

10. Outcomes and Reporting

Possible outcomes include:

- No further action;
- Policy, procedural, or governance improvements;
- Disciplinary action;
- Referral to external authorities or regulators.

Whistleblowers will be informed of the general outcome, subject to confidentiality and data protection constraints.

11. Oversight, Governance, and Review

- The Council holds ultimate responsibility for this policy.
- The Audit Committee will receive anonymised annual reports on whistleblowing activity.
- This policy will be reviewed annually to ensure continued alignment with:
 - OfS regulatory expectations,
 - the UK Quality Code,
 - legislative and sector developments.

12. Culture and Continuous Improvement

The Institute is committed to embedding a culture where staff and students feel confident to speak up in support of:

- academic excellence,
- student welfare,
- ethical leadership,
- regulatory compliance.

Whistleblowing is recognised as a vital component of effective governance and quality assurance.