

Whistleblowing Policy

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1. Purpose

The London Academy for Applied Technology (LAAT) is committed to the highest standards of probity, accountability, integrity and governance. This policy sets out how LAAT enables staff, students and other people within scope to raise genuine concerns in public interest about wrongdoing, malpractice, serious risk or regulatory non-compliance across its higher education provision and wider operations.

The policy provides a clear alternative reporting route for cases where normal line management, complaints, student casework or HR procedures may be inappropriate, ineffective, unavailable, compromised by a conflict of interest, or may place the individual raising the concern at a disadvantage or at risk of detriment.

This policy is intended to promote a culture of openness, responsible reporting and continuous improvement. It encourages concerns to be raised at the earliest opportunity, protects individuals who raise concerns where they reasonably believe the information tends to show wrongdoing and where the disclosure is made in the public interest from retaliation, and ensures that disclosures are assessed, investigated and acted upon fairly, confidentially and proportionately.

This policy is designed for an independent higher education provider operating under a validation agreement with Plymouth Marjon University. It should be read alongside LAAT's governance, safeguarding, academic quality, prevent duty, staff conduct and student conduct arrangements.

This policy supports LAAT in meeting its responsibilities under Office for Students (OfS) Conditions E1, E2 and E3. Where concerns relate to student treatment, consumer transparency or fair process, it also contributes to compliance with Conditions C1 and C5.

2. Scope

2.1 Persons covered by this policy

This policy applies to all of the following, regardless of length of service, seniority, contract type, working pattern or immigration status:

employees of LAAT, including permanent, fixed-term, part-time, full-time, hourly paid, casual and zerohours staff. workers, agency workers and secondees working under LAAT direction. governors and members of LAAT committees or governance bodies. contractors, consultants, suppliers and service providers working with or on behalf of LAAT. interns, volunteers, work placement staff and apprentices acting in a LAAT-related capacity. visiting lecturers, visiting academics, guest speakers and external contributors.

current students registered with LAAT, where the concern relates to a public interest matter rather than an individual complaint only; and any other person working with, studying at, providing services to, or acting on behalf of LAAT.

2.2 Concerns covered by this policy

This policy applies to concerns raised in the public interest relating to suspected wrongdoing, unlawful conduct, financial irregularity, fraud, bribery, corruption, abuse of power, safeguarding failure, health and safety risk, academic or research malpractice, regulatory non-compliance, environmental damage, serious misconduct, or deliberate concealment of any such matter.

The concern must normally go beyond a purely personal issue and indicate a wider public interest risk affecting students, staff, visitors, partner obligations, regulatory compliance, institutional integrity, the proper use of funds, or LAAT's public accountability.

2.3 Locations and activities covered.

This policy applies to all LAAT campuses, approved online and blended delivery environments, teaching or assessment activity, events, placements, partner-related activity, external representation, work-related travel and any other location where LAAT business or LAAT-sponsored activity is taking place.

2.4 Matters not normally covered by this policy.

This policy does not normally apply to:

- Personal employment grievances, interpersonal disputes, dissatisfaction with management decisions, or issues affecting only the individual raising the matter, unless the concern also engages a wider public interest issue.
- Routine student complaints, academic appeals, extenuating circumstances requests or disagreement with academic judgement, unless the issue also indicates systemic malpractice, regulatory breach, serious risk or deliberate concealment.
- Minor day-to-day management issues that can reasonably be resolved through normal supervision, local management or service channels; or
- Matters that are more appropriately addressed under LAAT's grievance, dignity at work, student complaints, academic appeals, disciplinary, safeguarding, academic misconduct, capability or other specialist procedures.

Safeguarding emergencies, criminal incidents and immediate health and safety threats must be escalated through emergency, safeguarding, security or health and safety routes without delay. These matters may also be recorded and considered under this policy where appropriate.

Where a concern relates to validated or franchised higher education provision, LAAT will work with Plymouth Marjon University where required under the validation agreement. However, nothing in this policy overrides LAAT's statutory duties, regulatory obligations, or responsibilities under Office for Students requirements.

3. Definitions

Term	Definition
Whistleblowing	The disclosure of information which, in the reasonable belief of the person making the disclosure, is made in public interest and tends to show wrongdoing, malpractice or risk of the kind described in this policy.
Protected disclosure	A disclosure that meets the legal requirements under the Public Interest Disclosure Act 1998 and the Employment Rights Act 1996. In broad terms, this requires a worker to reasonably believe that the information disclosed tends to show a relevant failure, such as a criminal offence, breach of legal obligation, miscarriage of justice, danger to health and safety, environmental damage, or deliberate concealment, and that the disclosure is made in the public interest.
Public interest	A concern that goes beyond a purely personal matter and may affect students, staff, visitors, partner obligations, institutional integrity, regulatory compliance, public confidence, safeguarding, health and safety, or the proper use of funds and resources.
Worker	A person who falls within the definition of worker for the purposes of whistleblowing protection, including employees and other individuals who perform work or services in circumstances where public interest disclosure protections may apply.
Detriment	Any disadvantage or adverse treatment arises because an individual has raised or supported a concern, including victimization, harassment, exclusion, threats, disciplinary action, loss of opportunity, reduced access to work or study opportunities, or dismissal.

Whistleblowing Officer	The senior individual appointed to coordinate the handling of a disclosure, confirm next steps, oversee confidentiality arrangements, maintain appropriate records and ensure that the concern is referred, investigated or escalated through the appropriate route.
Whistleblowing Guardian	A non-executive Board member designated to provide an independent and accessible point of contact, particularly where a person does not feel able to use standard internal reporting routes or where there are concerns about the independence of the internal process.
Prescribed person	An individual or organisation formally prescribed under whistleblowing legislation to receive disclosures about specified matters outside the employer. A disclosure to a prescribed person may be protected if the legal conditions are met and the correct body is selected for the subject matter.
Prescribed body	A body or organisation listed by government as being prescribed for specific categories of concern, such as health and safety, data protection, qualifications, fraud or environmental matters.
Good faith	Acting honestly and without knowingly making a false or misleading disclosure. While LAAT encourages concerns to be raised in good faith, statutory whistleblowing protection primarily depends on whether the individual reasonably believes that the information disclosed tends to show a relevant wrongdoing, that the disclosure is made in the public interest, and that it is made through an appropriate reporting route in accordance with applicable law. A concern will not be disregarded solely because it is not substantiated, provided it was raised on the basis of a reasonable belief.
Malicious allegation	A disclosure raised knowing it to be false, recklessly, or primarily to cause harm rather than to report a genuine public interest concern. Where an allegation is found to be malicious, it may itself be addressed under disciplinary, student conduct, contractual or other relevant procedures.

3.1 Protected disclosures

LAAT recognises that some disclosures may qualify for statutory protection. The legal protection for whistleblowing is complex and depends on the facts, the status of the person making the disclosure, the subject matter, the recipient of the disclosure and whether the disclosure is made in the public interest.

A disclosure may be protected where the individual reasonably believes that the information disclosed tends to show one or more of the relevant failures recognised by law, including criminal offences, breaches of legal obligation, miscarriages of justice, danger to health and safety, environmental damage, or deliberate concealment of any such matter.

This policy is not intended to limit statutory rights. Individuals considering external disclosure are encouraged to seek independent advice, for example from a trade union, a professionally qualified lawyer or the independent whistleblowing charity Protect.

4. Principles

The following principles underpin LAAT's approach to whistleblowing and public interest disclosure:

1. Openness and early reporting - LAAT encourages concerns to be raised as soon as possible so that risks can be assessed and addressed promptly. There is no strict time limit on raising a concern, but early disclosure is strongly encouraged.
2. Protection from retaliation - Any retaliation, victimisation or harassment against a whistleblower, witness or person supporting a disclosure will be treated as a serious disciplinary matter.
3. Confidentiality and dignity - Disclosures will be handled sensitively, confidentially and on a strict need-to-know basis, in compliance with UK GDPR and LAAT's Data Protection Policy. LAAT recognises the significant impact that investigations can have on all parties and will act to protect the dignity of all individuals concerned.
4. Fairness, independence and proportionality - Concerns will be assessed objectively and investigated by an appropriate person who is suitably independent and has the skills, seniority and expertise required. The seriousness of the concern will determine the level of resource and scrutiny applied.
5. Student, staff and public interest focus - Decisions under this policy will prioritise safety, wellbeing, lawful treatment, regulatory compliance and the integrity of LAAT's provision.
6. Accessibility - LAAT will ensure that this policy and its reporting mechanisms are accessible to all persons in scope, including those with disabilities, those for whom English is not a first language, and those who may face additional barriers to speaking up.
7. Regulatory and partner alignment - LAAT will operate this policy consistently with public interest disclosure law, OfS expectations, Plymouth Marjon University validation requirements, safeguarding obligations and Prevent duty responsibilities.
8. Clarity and accountability - Responsibilities, escalation routes, decisions and outcomes will be documented so that LAAT can demonstrate effective governance, oversight and continuous improvement.

5. Governance, Committees and Oversight

LAAT operates an Executive Leadership Team (ELT) comprising the Accountable Officer, Chief Finance and Operating Officer (CFOO) and Dean. The Senior Management Team (SMT) consists of the ELT together with designated senior managers including HR, Finance, and other operational managers. LAAT does not operate with a Senior Leadership Team (SLT).

5.1 Board of Governors

Ultimate responsibility for whistleblowing governance rests with the Board of Governors. The Board is responsible for ensuring that LAAT maintains effective arrangements for speaking up, managing public interest concerns, protecting individuals from retaliation, and learning from disclosures.

The Board of Governors will receive an annual report from the Audit, Risk & Finance Committee on the operation of this policy. The report will include anonymised data on concerns raised, investigations, outcomes, lessons learned, improvement actions and emerging themes.

5.2 Audit, Risk & Finance Committee

The Audit Risk & Finance Committee has primary responsibility for overseeing the implementation, effectiveness and periodic review of this policy. In relation to this policy, the Committee will:

9. review this policy periodically and recommend substantive changes to the Board of Governors for approval.
10. receive anonymised information on concerns raised, themes, investigations, outcomes, lessons learned and improvement actions on at least an annual basis and by exception as required.

11. monitor compliance with relevant legal, regulatory and partner requirements, including public interest disclosure protections, OfS expectations and Plymouth Marjon University obligations where applicable.
12. seek assurance that disclosures are handled promptly, fairly, confidentially and with appropriate independence.
13. recommend actions to strengthen governance, reduce institutional risk and improve staff and student confidence in speaking-up arrangements; and
14. report material issues and emerging themes to the Board of Governors on at least an annual basis.

5.3 Whistleblowing Guardian

The Board of Governors shall appoint an Independent Governor to act as the Whistleblowing Guardian in accordance with Article 62 of the Articles of Association.

The Whistleblowing Guardian provides an independent route for disclosures where an individual cannot reasonably use the normal internal reporting arrangements or where the concern involves senior office holders.

The Whistleblowing Guardian will:

- Provide an independent point of contact;
- Oversee the effectiveness of the whistleblowing framework;
- Ensure concerns involving senior officers are managed independently;
- Report anonymised themes and governance issues to the Audit, Risk and Finance Committee and the Board;
- Promote confidence in LAAT's speaking-up arrangements.

The Whistleblowing Guardian does not investigate cases directly unless specifically authorised by the Board.

The name and contact details of the current Whistleblowing Guardian will be published on LAAT's intranet, student portal and staff handbook.

Insert current Whistleblowing Guardian details: Name / email address / telephone number.

6. Roles and Responsibilities

Role	Responsibilities
Policy Owner - Accountable Officer	Executive accountability for the policy and OfS reporting; ensures it remains fit for purpose and aligned to partner, regulatory and legal requirements; designates a Whistleblowing Officer or alternative route where required; ensures a confidential register of concerns, investigations and outcomes is maintained; commissions external or independent review where required.
Whistleblowing Officer	Coordinates the handling of disclosures; confirms acknowledgement and next steps; assesses policy fit; ensures appropriate confidentiality; appoints or recommends an investigator; monitors progress; ensures records and outcomes are maintained securely; escalates material concerns where required.

Chair of the Board of Governors	Acts as the escalation route for concerns involving the Registrar and Accountable Officer, the Dean, other Executive Leadership Team (ELT), the Whistleblowing Guardian, or any matter where ordinary internal routing would create a conflict of interest. May appoint an independent investigator, panel or adviser.
Whistleblowing Guardian	Independent Governor providing an independent reporting route and governance oversight; receives concerns from individuals who cannot use standard routes; escalates concerns involving Executive Leadership Team (ELT); reports to the Board on the policy's effectiveness; supports awareness and visibility of the policy.
Governance and Compliance	Policy custodian, Whistleblowing Officer, case management, and secure
Lead / Governance Officer	records; acknowledges concerns where delegated; maintains secure records; advises on process; prepares anonymised committee reports; ensures the policy is accessible on staff and student platforms; coordinates annual awareness activity with HR.
HR Lead	Ensures whistleblowing protections are referenced in employment contracts, induction programmes and the staff handbook; provides HR advice to investigations where required; supports the management of employment-related consequences, including protection from detriment and any disciplinary action arising from retaliation or malicious allegations.
Line managers and team lead	Create an environment where concerns can be raised safely; escalate disclosures promptly; avoid suppressing or informally settling serious concerns; maintain confidentiality; cooperate fully with any investigation.
Dean and senior academic leads	Provide expertise where disclosures affect academic standards, assessment integrity, research integrity, student protection or validating-partner obligations; implement resulting academic actions; support partner notification where required.
Specialist leads, including Safeguarding, HR, Finance, Data Protection, Prevent and Health & Safety	Provide subject matter advice; ensure compliance within their area; take or support urgent protective action; maintain specialist records where required; support any external or regulatory referrals.
All staff, students and other people in scope	Raise concerns honestly and promptly; provide relevant information where possible; maintain confidentiality; avoid conduct that could compromise an investigation or place others at risk; cooperate with reasonable requests for information.

7. Policy Statement

7.1 What may be raised under this policy.

A concern may be raised under this policy where the individual reasonably believes that the information disclosed tends to show one or more of the following:

- A criminal offence has been committed, is being committed or is likely to be committed.
- A person has failed, is failing or is likely to fail to comply with a legal or regulatory obligation.

- an injustice has occurred or may occur.
- fraud, financial irregularity, bribery, corruption, blackmail, dishonesty or serious misuse of funds or assets have taken place.
- the health, safety or wellbeing of any person is endangered.
- Safeguarding duties are not being met, or students, staff or visitors are being exposed to serious harm.
- the environment may be damaged.
- academic standards, assessment integrity, research integrity or the integrity of regulatory returns or institutional records are being compromised.
- There has been serious abuse of power, serious governance failure or a departure from statutory, regulatory or good governance requirements.
- The conduct of an external partnership, agent, subcontractor or articulation arrangement may affect student welfare, academic standards, regulatory compliance or institutional integrity.
- harassment, bullying or discrimination affects a group of individuals or forms a pattern of institutional conduct, where the concern goes beyond an individual grievance and is in the public interest; or
- information relating to any of the above has been, is being, or is likely to be deliberately concealed.

The policy may also be used for concerns about the integrity of higher education delivery, research, validation-related obligations and other serious matters affecting LAAT's reputation, governance or public accountability.

7.2 Who can raise a concern?

A concern may be raised under this policy by any person within scope, including staff, students currently registered with LAAT, governors, consultants, interns, volunteers, contractors, agency workers, casual workers, guest workers, visiting academics, visiting lecturers and those on work experience or placement activity linked to LAAT.

7.3 Safeguards and support

LAAT expects concerns to be raised with reasonable belief. In return, LAAT will take them seriously, handle them with care and confidentiality, and will not tolerate retaliation against any person who raises a genuine concern under this policy.

Pastoral, wellbeing, employee support or student support may be offered where an ongoing case has an impact on the person raising the concern or on others directly affected. Support may also be offered to witnesses and to the subject of an allegation, where appropriate and without compromising the integrity of the investigation.

7.4 Confidentiality, data protection and anonymity

Where confidentiality is requested, LAAT will take all reasonable steps to protect the identity of the person raising the concern. Absolute confidentiality cannot be guaranteed where disclosure is required by law, safeguarding necessity, due process, regulatory obligation, or because witness evidence is needed. In such cases, LAAT will discuss the position with the individual in advance wherever possible.

Where the subject of an allegation needs to be informed of the general nature of a concern in order to participate fairly in an investigation, LAAT will manage that disclosure carefully, balancing the rights of all parties and the interests of a fair process.

Personal data collected in connection with a whistleblowing disclosure will be processed in accordance with LAAT's Data Protection Policy and UK GDPR. Data will be retained for six years from the date of case closure, or longer where required by law, regulatory obligation, safeguarding requirement or ongoing legal proceedings.

Whilst anonymous disclosures may be more difficult to investigate because LAAT may be unable to seek further information or provide feedback to the individual, they will not be dismissed where there is sufficient information, credibility or seriousness to justify assessment and action. LAAT will not attempt to identify the source of an anonymous disclosure.

7.5 Reporting channels

The following reporting channels should be used according to the nature of the concern and any conflict of interest:

Reporting route	Contact details	When to use
Line manager	Insert name / role / email / telephone	First point of contact for most concerns where there is no conflict of interest and the individual feels able to use the normal management route.
Governance	Agrima@laat.ac.uk	Use this route where the concern relates to governance, compliance, regulatory matters, records or reporting, or where the line manager route is inappropriate.
Registrar and Accountable Officer / Whistleblowing Officer	Stephen.Plant@laat.ac.uk	Use this route where previous reporting routes are unavailable, inappropriate, have been used without a satisfactory outcome, or where the concern requires senior oversight.
Whistleblowing Guardian - Non-Executive Board Member	Alan.fenton1@laat.ac.uk	Use this route where the concern involves the Registrar and Accountable Officer, the Dean, and other Executive Leadership Team (ELT), or where the individual does not feel able to use standard internal reporting routes.
Chair of the Board of Governors	Sarah.McAdam@laat.ac.uk	Use this route for concerns involving the most senior officers of LAAT, the Whistleblowing Guardian, or where all other internal routes present a conflict of interest.
Senior Independent Governor	Alan.fenton1@laat.ac.uk	Where the Chair of the Board, the Whistleblowing Guardian or another senior officeholder is implicated, or where complete independence from existing governance routes is required.

Anonymous reporting channel (Protect is an independent whistleblowing charity that provides confidential advice to individuals considering raising concern. It is not part of LAAT and is not an internal reporting channel. Individuals may contact Protect for independent advice before deciding whether to raise concern internally or make a disclosure to an appropriate prescribed person.)	Protect Advice Line: 020 3117 2520.	Use this route where the individual wishes to raise a concern without identifying themselves. LAAT will assess all anonymous disclosures on their merits.
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Once it is confirmed that this policy applies, the individual will normally be asked to set out the concern in writing. The disclosure should include where possible:

- a summary of the concern.
- relevant facts, dates and locations.
- supporting documents or evidence available.
- names of any witnesses or individuals involved.
- whether confidentiality is requested.
- whether there is immediate safety, safeguarding, regulatory or operational risk; and
- whether the individual has any personal interest in the matter.

A person raising a concern may be accompanied by a trade union representative or trusted work colleague at any confidential meeting held under this policy, where that is appropriate and permitted by the relevant process.

7.6 Initial response and assessment

Following receipt of a disclosure, LAAT will determine whether the matter constitutes an Office for Students reportable event under the current regulatory framework.

Where a reportable event is identified, the Accountable Officer will ensure that the Office for Students is notified within the required timescales. Internal investigation of the matter will not delay any regulatory notification where immediate reporting is required.

LAAT will assess the disclosure to determine whether it should be handled under this policy or under another LAAT or partner procedure, such as grievance, complaints, disciplinary, safeguarding, academic misconduct, student conduct or capability. Where a concern could be handled under more than one procedure, LAAT will determine the most appropriate route and inform the individual accordingly, subject to confidentiality and legal constraints.

Where immediate risk is identified, including safeguarding risk, risk to health and safety, risk of destruction of evidence, legal risk or operational risk, LAAT may take urgent protective action before the full investigation begins.

Depending on the seriousness and nature of the concern, LAAT may undertake an internal review, commission a full investigation, refer the matter to an independent person, notify the police, inform a regulator, notify the validating partner or refer the matter to another appropriate external body.

7.7 Investigation and outcome

Where an internal investigation is required, an appropriately independent investigator or investigating manager will be appointed with the skills, seniority and expertise proportionate to the nature and seriousness of the concern. For highly sensitive, complex or senior-level matters, LAAT may appoint an external investigator or adviser.

A confidential interview with the person raising the concern will ordinarily take place within ten working days of written confirmation that the case is proceeding under this policy, unless urgent protective action or other circumstances require a different sequence.

LAAT will aim to complete standard investigations within 60 working days of the investigator's appointment. Where a complex or sensitive matter requires a longer period, the Whistleblowing Officer will notify the person raising the concern, where appropriate, and the Audit, Risk & Finance Committee of the revised timescale and the reasons for any extension.

Investigations will follow LAAT's relevant investigation standards and the principles of natural justice. The investigator will gather evidence, interview relevant witnesses, secure records and assess the matter objectively. The person raising the concern is not expected to investigate the matter themselves. Their role is to disclose what they know, based on a reasonable belief that the information may show wrongdoing, malpractice or risk. At the conclusion of the investigation, the investigator will produce a report or outcome note setting out the facts established, findings and recommendations. Outcomes include:

- no further action.
- local management action.
- policy, control, governance or training improvements.
- referral to disciplinary, capability, safeguarding, student conduct, academic misconduct or research integrity procedures.
- notification to Plymouth Marjon University or another partner body.
- referral to an external authority, regulator, prescribed person or law enforcement body; or
- a combination of the above.

As far as LAAT lawfully and reasonably can, the person raising the concern will be informed that the investigation has concluded and whether further action will be taken. Detailed findings, personal data and disciplinary outcomes may not be shared where confidentiality, legal obligations or the rights of others prevent this.

7.8 Protection from detriment and malicious allegations

No person should suffer detriment because they raised, supported or participated in a genuine concern under this policy. This protection applies regardless of whether the concern is ultimately substantiated, provided it was raised with a genuine and reasonable belief.

Any retaliation, victimisation or harassment of a whistleblower, witness or person supporting a disclosure will be treated as a serious matter and may result in disciplinary, student conduct, contractual or other formal action.

Staff and students are reminded that the law provides additional protection, including the right not to be dismissed or subjected to detriment because of a protected disclosure under the Employment Rights Act 1996.

Where an investigation determines that a disclosure was knowingly false, reckless or malicious and intended to cause harm rather than to report a genuine public interest concern, that conduct may itself amount to misconduct and may be addressed under the relevant LAAT or partner procedure.

7.9 External reporting

LAAT's preferred approach is to resolve concerns through internal procedures wherever possible, ensuring that concerns are addressed promptly, fairly and proportionately. However, there may be circumstances where it is appropriate or legally necessary to report a matter to an external regulatory, safeguarding, funding, law enforcement or other public body.

Anyone considering an external disclosure is strongly encouraged to seek advice first, for example from a trade union, a professionally qualified lawyer, or the independent whistleblowing charity Protect. If an individual reasonably believes that the substance of the concern may involve a serious internal conflict, cover-up or conspiracy at a sufficiently senior level, they may report externally in accordance with the law after using or considering the most independent available internal route.

Nothing in this policy prevents any person from making a protected disclosure to an appropriate prescribed person in accordance with applicable law. The following table gives examples of external bodies that may be relevant. It is not exhaustive and individuals should check the current GOV.UK list of prescribed people before making an external disclosure.

Area of concern	Possible external body or route	Indicative use
Whistleblowing advice	Protect	Independent confidential advice on whether and how to raise a whistleblowing concern.
Education, qualifications and assessments	Ofqual, Department for Education or other relevant education body	Qualification, assessment, awarding or education-sector matters where the relevant body has jurisdiction.
Higher education regulation	Office for Students or validating partner route, where applicable	Registered higher education provider matters, regulatory compliance, student protection or partner oversight. Individuals should seek advice on protection status before external disclosure.
Health and safety	Health and Safety Executive or local authority	Workplace health and safety or public safety arising from work activity.
Data protection	Information Commissioner's Office	Compliance with data protection and freedom of information legislation.
Fraud, bribery or corruption	Serious Fraud Office, police, National Crime Agency, external auditor or other relevant body	Serious fraud, bribery, corruption or financial crime.

Environmental damage	Environment Agency or other relevant environmental body	Environmental harm or regulatory non-compliance.
Safeguarding, Prevent or criminal risk	Police, local authority safeguarding route, Prevent coordinator or Channel route	Immediate or serious safeguarding, criminal, radicalisation or extremist risk.

7.10 Record-keeping

A confidential record of all whistleblowing concerns, investigations, actions and outcomes will be maintained securely by the Governance and Compliance function, with access restricted to those with a legitimate need for the information.

Records will be retained and disposed of in line with LAAT's retention schedule, data protection obligations and any legal hold, safeguarding, Prevent or regulatory requirement. Where a concern also engages LAAT's Prevent duty obligations, records should also be escalated and managed through LAAT's Safeguarding and Prevent arrangements. This policy supports, but does not replace, those statutory obligations.

7.11 Equality, diversity and accessibility

LAAT is committed to ensuring that this policy is accessible to all persons within its scope, regardless of age, disability, gender reassignment, marriage and civil partnership status, pregnancy and maternity, race, religion or belief, sex, sexual orientation, or any other protected characteristic under the Equality Act 2010. An Equality Impact Assessment (EIA) has been conducted in relation to this policy. The EIA confirms that the policy, as drafted, does not have a disproportionate adverse impact on any protected group. LAAT will keep this assessment under review and will update it on each policy review cycle.

Where a person within scope requires a reasonable adjustment in order to access the reporting process, for example due to a disability, communication need or because English is not their first language, LAAT will make appropriate arrangements. Individuals may request adjustments by contacting the Governance and Compliance Lead or the Whistleblowing Officer.

Key information about this policy will be made available in accessible formats and, on request, in languages other than English. Details of available formats are available from Governance and Compliance Lead.

7.12 Prevent duty.

LAAT is committed to fulfilling its statutory Prevent Duty under the Counterterrorism and Security Act 2015. Staff must comply with the requirements set out in the LAAT Prevent and British Values Policy, including recognising safeguarding concerns, completing mandatory Prevent training, and following the established reporting and referral procedures. This policy should be read alongside the LAAT Prevent Policy and does not duplicate those operational arrangements.

8. Standard Operating Procedure (SOP) - Overview

The detailed Standard Operating Procedure for this policy is set out in Appendix A. The SOP explains how concerns are raised, acknowledged, triaged, investigated, escalated, recorded and closed, including normal response times and specialist referral points.

The SOP covers:

15. Planning and preparation - immediate safety, safeguarding, Prevent or legal escalation where required.
16. Communication - how the whistleblowing route is explained and how acknowledgements and updates are provided.
17. Operational steps - the core stages of triage, investigation, decision-making and follow-up.
18. Escalation - what happens when a concern involves Executive Leadership Team (ELT), governors, partner obligations, conflicts of interest or external agencies.
19. Record-keeping - what is retained, by whom, and how confidentiality is maintained.

9. Regulatory, Partner and Legal Framework

Where a disclosure identifies systemic harassment, sexual misconduct or behaviour affecting students, LAAT will also consider its responsibilities under Office for Students Condition E6 and associated safeguarding arrangements.

This policy is aligned with, and must be read alongside, the following legislative, regulatory and partner frameworks:

- Plymouth Marjon University regulations, codes and procedures where a disclosure relates to validated or franchised higher education provision, academic standards, research integrity, safeguarding, student protection or other partner-controlled matters.
- Office for Students Conditions E1, E2 and E3 and, where relevant to student-facing process and transparency, Conditions C1 and C5.
- the UK Quality Code for Higher Education, insofar as the concern relates to higher education, governance, academic quality, standards or student experience.
- the Public Interest Disclosure Act 1998 and the Employment Rights Act 1996, as amended.
- the Counterterrorism and Security Act 2015 and associated Prevent duty guidance.
- the Equality Act 2010, Health and Safety at Work etc. Act 1974, Bribery Act 2010, Fraud Act 2006, Data Protection Act 2018 and UK GDPR; and
- safeguarding, employment, charity, financial, regulatory or other statutory duties relevant to the concern.

If partner, regulatory or legal requirements change, this policy will be reviewed and updated accordingly.

10. Monitoring, Compliance and Review

10.1 Monitoring

The Policy Owner and Governance and Compliance Lead will monitor implementation through the confidential case register, timeliness of response, themes and trends, action completion, training completion, and annual or exception reporting to the Audit, Risk & Finance Committee and Board of Governors.

An anonymised Whistleblowing Annual Report will be presented to the Audit, Risk & Finance Committee at least once per academic year, covering the number of disclosures received, their nature, the outcome of investigations, lessons learned and any actions taken to improve the policy or related processes.

Where relevant, thematic or anonymised reports may also be shared with the Senior Management Team, Academic Board or specialist leads so that systemic issues affecting students, staff or provision can be addressed.

10.2 Training and awareness

LAAT will ensure that all staff receive awareness training on this policy and their responsibilities under it at induction and at a minimum annually thereafter. Training will be provided in an accessible format. Online completion is recommended for scalability, and records of completion will be maintained by the HR function.

- All new staff receive this policy during induction.
- Mandatory awareness training forms part of the induction programme.
- Refresher training is delivered annually (or sooner following legislative or policy changes).
- Managers are responsible for ensuring staff understand their responsibilities.
- HR maintains training records and monitors completion through the mandatory training tracker.
- Non-compliance will be followed up through line management and, where necessary, relevant HR procedures.

The Governance and Compliance Lead will ensure that this policy is prominently accessible on LAAT's intranet, student portal and staff handbook, and that the contact details of the Whistleblowing Officer and Whistleblowing Guardian are kept up to date.

10.3 non-compliance

Failure to comply with this policy, attempts to suppress or conceal a reportable concern, retaliation against a whistleblower, or breaches of confidentiality may be addressed under disciplinary, student conduct, contractual, safeguarding or other appropriate procedures.

10.4 Review

This policy will be reviewed annually, or sooner where there is a material change in LAAT's legal duties, OfS expectations, Plymouth Marjon University requirements, institutional structure or risk profile.

Following any significant disclosure or investigation, the Policy Owner will consider whether the policy requires updating to incorporate lessons learned.

The policy will be benchmarked against sector developments, including any updated OfS guidance, QAA expectations, changes in PIDA case law, public interest disclosure developments and relevant higher education governance practice on each review cycle.

The Policy Owner is responsible for initiating the review and presenting recommended changes to the Audit, Risk & Finance Committee and Board of Governors as required.

11. Related Documents

- LAAT Anti-Bribery and Corruption Policy
- LAAT Safeguarding and Prevent Policy
- LAAT Staff Grievance
- LAAT Student Complaints and Appeals procedures.
- LAAT Academic Integrity Policy
- LAAT Health and Safety Policy
- LAAT Data Protection Policy
- LAAT Abuse of Power Code of Practice
- LAAT Board of Governors and Audit, Risk & Finance Committee terms of reference
- LAAT Staff Code of Conduct

Appendix A - Standard Operating Procedure: Whistleblowing Detailed Steps

A1. Process overview

The SOP provides a structured route for receiving, assessing, investigating and closing whistleblowing disclosures at LAAT. It is designed to ensure prompt acknowledgement, proportionate action, appropriate independence, lawful handling of sensitive information, and a clear escalation route.

A2. Step-by-step stages

Stage	Action	Owner / Lead	Expected record
Stage 1 - Raise the concern	The concern should be raised as soon as possible through the most appropriate route: line manager, Governance and Compliance Lead, Whistleblowing Officer, Whistleblowing Guardian or Chair of the Board. If there are immediate safeguarding, criminal, health and safety, Prevent or serious welfare risk,	Person raising concern / receiving officer	Concern record or disclosure form
	emergency and safeguarding procedures must be triggered without delay as well as recording the matter under this policy where appropriate.		
Stage 2 - Initial triage and policy fit	LAAT will assess whether the matter falls within this policy or should be managed under another procedure. Conflicts of interest will be checked at the outset. If the concern involves the normal receiving officer or a senior officeholder, an alternative and more independent route will be activated, including the Whistleblowing Guardian where appropriate.	Whistleblowing Officer / Governance and Compliance Lead	Triage note and route decision
Stage 3 - Written disclosure and acknowledgement	Where possible, the concern will be documented in writing with the key facts, dates, people involved, evidence available, witnesses and any confidentiality request. Receipt will normally be acknowledged within five working days, together with the immediate intended action, request for further information or confirmation of referral to another procedure.	Whistleblowing Officer / Governance and Compliance Lead	Acknowledgement and disclosure record

Stage 4 - Risk assessment and investigator appointment	A risk assessment will consider seriousness, urgency, student or staff welfare, safeguarding implications, prevent implications, legal or regulatory reporting obligations, risk of evidence destruction and whether partner notification is required. An investigator or investigating manager with appropriate independence and expertise will be appointed. For highly sensitive matters, LAAT may appoint an external investigator or adviser.	Whistleblowing Officer / Chair of Governors where required	Risk assessment and investigation appointment note
Stage 5 - Investigation	A confidential meeting with the person raising the concern will normally take place within ten working days of confirmation that the case is proceeding under this policy, unless urgent protective action or another sequence is required. The investigation may include interviews, document review, data review, site visits, liaison with specialist leaders and preservation of relevant records. LAAT will aim to complete standard investigations within 60 working days of investigator appointment.	Investigator	Investigation plan, notes and evidence log
Stage 6 - Outcome and decision route	The investigator will produce a report or outcome note setting out the facts established, findings and recommendations. Possible outcomes include no further action, local	Investigator / Whistleblowing Officer	Investigation report or outcome note
	management action, policy, control or training improvements, referral to disciplinary, capability, safeguarding, student conduct, academic misconduct or research integrity procedures, or referral to an external authority.		
Stage 7 - Communication, closure and next steps	Subject to confidentiality, legal constraints and the rights of others, LAAT will inform the person who raised the concern that the matter has been considered and whether further action is being taken. Where the person remains dissatisfied after the internal process has concluded, they may seek advice from their trade union, a professionally qualified lawyer, Protect or an appropriate prescribed person.	Whistleblowing Officer / Governance and Compliance Lead	Outcome communication and closure note

Stage 8 - Recordkeeping and oversight	The Governance and Compliance function will maintain the confidential case log, supporting documents, decisions, actions and closure dates. Themes, trends and lessons learned will be reported in anonymised form to the Audit, Risk & Finance Committee and, where relevant, to the Board of Governors.	Governance and Compliance Lead	Case register and annual report
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A3. Forms, templates and systems

- Whistleblowing Disclosure / Concern Report Form
- Confidential Whistleblowing Case Register
- Investigation Plan and Investigation Report Template
- Outcome / Action Tracker
- Restricted governance or HR case management folders
- Secure email and document storage in accordance with data protection requirements

Appendix B - Topic-Specific Guidance and Good Practice

B1. Matters that are usually suitable for whistleblowing.

- Fraud, bribery, corruption, serious misuse of funds or improper financial practice.
- Serious safeguarding failures or conduct that expose students, staff or visitors to harm.
- Systemic non-compliance with applicable law, regulatory requirements, OfS conditions, or the obligations of LAAT's validation agreement with Plymouth Marjon University.
- Serious academic or research integrity concerns, including manipulation of records, assessment of security failures or falsification of data.
- Conduct of external partnerships, agents, contractors or articulation arrangements that may affect student welfare, academic integrity, regulatory compliance or institutional reputation.
- Harassment, bullying or discrimination form a wider pattern of institutional conduct and engaging the public interest.
- Deliberate concealment of serious misconduct, safeguarding failure, regulatory breach or governance failure.

B2. Matters that are not usually whistleblowing on their own.

- A personal grievance about employment terms or treatment, unless it also reveals a wider public interest concern.
- A routine student service complaint, appeal against academic judgement or dissatisfaction with an individual decision, unless there is evidence of broader malpractice or risk.
- Minor day-to-day management issues that can be resolved through normal supervision or service channels.
- A disagreement with a policy decision where there is no evidence of wrongdoing, legal breach, risk or concealment.

B3. Good practice when raising concern.

- Raise the matter early and stick to facts, observations, dates and evidence.
- Explain why you believe the matter is in the public interest or why it affects others beyond your own position.

- Do not investigate the matter yourself or confront others in a way that could compromise evidence, safety or fairness.
- Keep the concern confidential and share it only through appropriate channels.
- Seek support where needed. Raising a concern can be difficult, and LAAT recognises the importance of pastoral and professional support for all parties.

B4. External advice and prescribed persons

Protect provides free and confidential whistleblowing advice. Protect is not a decision-making body for LAAT and does not investigate LAAT concerns, but individuals may contact Protect for independent advice about raising a concern.

Where an individual wishes to make a disclosure externally, they should ensure that the correct prescribed person or body is selected for the issue. The current prescribed persons list is maintained by government and should be checked before any external disclosure is made.

Appendix C - Reporting and Record-Keeping Templates

C1. Minimum content for a disclosure record

- Name and contact details of the person raising the concern, unless anonymous.
- Role or connection with LAAT.
- Date concern received.
- Reporting route used.
- Summary of concern.
- Relevant facts, dates, locations and individuals involved.
- Evidence provided or available.
- Immediate safety, safeguarding, Prevent, health and safety, regulatory or legal risks.
- Confidentiality request and any reasonable adjustment needs.
- Initial triage decision and route selected.
- Acknowledgement date.
- Investigator appointed and date of appointment.
- Outcome and action tracking.
- Date closed and retention review date.

C2. Minimum content for annual reporting

- Number of disclosures received.
- Broad categories of concern.
- Reporting routes used.
- Number of anonymous disclosures.
- Number of matters investigated under this policy.
- Number of matters referred to another internal procedure.
- Number of matters referred externally.
- Investigation timescales and overdue cases.
- Themes, trends and institutional learning.
- Actions taken to improve policy, controls, training or governance.
- Equality, accessibility and support themes, reported in anonymised form.

Equality Impact Assessment

An Equality Impact Assessment has been completed for this policy and will be reviewed whenever the policy is substantially amended.

Document Approval

Role	Name	Signature	Date
Policy Owner (Accountable Officer)	Stephen Plant		
ARFC Recommendation	Chair, Audit Risk & Finance Committee		
Board Approval	Chair		