



WHISTLEBLOWING POLICY

Policy reference UKV-QA-28 | Version 3.0

UK Versity Online Limited | BAC Accredited College | UKPRN 10052768

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Version	3.0
Status	Updated
Effective date	1 October 2026
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Policy owner	Principal
Author	Director of Education
Approved by	Principal (Ramanjeet Singh), on behalf of the Academic Board
Approval date	1 October 2026

Whistleblowing Policy

UK Versity Online Limited | ATHE 889 | Pearson 07737 | OTHM DC1506132 | Ascentis 3286 | NCFE 8465520 | IFA Direct 283334

Document control

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Version	3.0
Status	Updated
Effective date	1 October 2026
Next review	September 2027 (annual), or earlier if required
Owner	Principal
Author	Director of Education
Approval authority	Academic Board, chaired by the Principal (Ramanjeet Singh)
Approval date	1 October 2026
Applies to	All UK Versity employees, workers, self-employed tutors, assessors, Internal Quality Assurers, contractors, agency staff and volunteers
Supersedes	Whistleblowing Policy QA-20 (August 2014, next review November 2022)
Summary	Explains how staff and contractors can raise concerns about wrongdoing at UK Versity safely and confidentially, how concerns are investigated, and the external bodies they can go to.

Compliance mapping

BAC College Scheme 2023 standards	3.5
UK Quality Code 2024 (voluntary)	Principle 1
OfS conditions (benchmark only; not OfS registered)	E (benchmark)
Awarding organisations	ATHE; Pearson; OTHM; Ascentis; NCFE; IFA Direct
Legislation and regulation	Public Interest Disclosure Act 1998 (Employment Rights Act 1996 Part IVA); Employment Rights Act 2025; Equality Act 2010; UK GDPR and Data Protection Act 2018

Version history

Version	Date	Change
1.0	August 2014	First issue (Whistleblowing Policy QA-20)
3.0	October 2026	Full rebuild: updated to current PIDA public interest test, prescribed persons (Ofqual, ICO, HSE), sexual harassment disclosures under the Employment Rights Act 2025, awarding organisation routes, BAC mapping and version control

1. Purpose

UK Versity Online Limited (trading as UK Versity) wants anyone who works for it to feel able to raise concerns about wrongdoing without fear of being treated badly. This policy explains what counts as a whistleblowing concern, how to raise one, how UK Versity will deal with it, the protection available, and the external bodies you can contact. It supports BAC standard 3.5 on staff grievance and appeals, and it protects the integrity of the qualifications UK Versity delivers.

2. Scope

This policy applies to all employees, workers, self-employed tutors, assessors and Internal Quality Assurers (IQAs), contractors, agency staff and volunteers, wherever they work. Legal protection under the Public Interest Disclosure Act 1998 applies to employees and workers. UK Versity extends the same internal protection against detriment to self-employed tutors and contractors as a matter of policy.

This policy is not for:

- personal complaints about your own employment or engagement, which go through the grievance procedure in UKV-QA-27;
- learner complaints, which go through UKV-QA-24 Complaints Policy and Procedure;
- immediate safeguarding concerns about a learner, which must be reported to the Designated Safeguarding Lead the same day under UKV-QA-25. If you raise a safeguarding concern and feel it has not been acted on, you can then use this policy.

3. Definitions

- **Whistleblowing:** reporting information that you reasonably believe shows wrongdoing, in the public interest.
- **Protected disclosure:** a disclosure of information that the person reasonably believes is in the public interest and tends to show one or more of the matters in section 4.1, made to an appropriate person (Employment Rights Act 1996, Part IVA).
- **Prescribed person:** an external body listed by the government to receive whistleblowing disclosures about matters within its remit.
- **Detriment:** any unfair treatment, such as dismissal, loss of work, withdrawal of hours, bullying or exclusion, because someone has raised a concern.

4. Policy statement

UK Versity is committed to running its business openly, honestly and lawfully. It will:

- take every concern seriously and deal with it promptly and fairly;
- keep the identity of the person raising a concern confidential as far as possible;
- not tolerate any detriment or victimisation against anyone who raises a concern, and treat such behaviour as a disciplinary matter;
- not use confidentiality clauses or agreements to stop anyone making a protected disclosure.

4.1 What you can raise

You can raise a concern if you reasonably believe that one or more of the following has happened, is happening or is likely to happen:

- a criminal offence, including fraud, bribery or theft;

- failure to comply with a legal obligation;
- a miscarriage of justice;
- danger to the health or safety of any person;
- damage to the environment;
- sexual harassment (from 6 April 2026, disclosures of sexual harassment are protected disclosures under the Employment Rights Act 2025);
- deliberate concealment of any of the above.

In UK Versity's setting this includes, for example: assessment or examination malpractice or maladministration; falsifying learner registrations, results or certification claims; claiming certificates for learners who have not completed the work; misuse of learner fees; breaches of data protection; failure to act on safeguarding concerns; and discrimination or harassment.

4.2 The public interest test

You do not need proof. You need a reasonable belief that the information tends to show wrongdoing and that raising it is in the public interest. Good faith is no longer a condition of legal protection, although a tribunal may reduce compensation if a disclosure was made in bad faith. Deliberately false or malicious allegations are a disciplinary matter.

5. How to raise a concern

5.1 Internal routes

Raise your concern with one of the following, in writing where possible and marked "Private and Confidential":

1. **The Quality Manager and Lead Internal Quality Assurer (Shazia Khan)**, particularly for concerns about assessment, IQA, malpractice or awarding organisation requirements.
2. **The Principal and Director of Education (Ramanjeet Singh)** for any concern.
3. **Where the concern involves the Principal**, raise it with the Quality Manager. The Quality Manager will investigate independently of the Principal and may involve an external adviser. If you believe the Quality Manager cannot deal with it independently, or the concern involves both the Principal and the Quality Manager, you may go directly to the relevant external prescribed person in section 7 or the awarding organisation in section 10.

You can raise concerns in writing to UK Versity House, 11 Woodcock Court, Waters Edge Business Park, Modwen Road, Salford M5 3EZ, marked for the attention of the named person, or by telephone on 0161 273 4745 asking to speak to them in confidence. Give as much detail as you can: what happened, when, who was involved and any evidence.

5.2 Anonymous concerns

You can raise a concern anonymously. UK Versity will look into it as far as it can, but anonymous concerns are harder to investigate and UK Versity cannot give you feedback. Raising a concern openly but in confidence is usually more effective.

5.3 Independent advice

You can get free, confidential advice before or at any stage from the whistleblowing charity Protect, from Acas, from a trade union or from a solicitor.

6. Procedure

1. **Acknowledgement.** The person receiving the concern acknowledges it in writing within 5 working days and offers a confidential meeting. You may be accompanied at any meeting by a colleague or trade union representative.
2. **Initial assessment.** Within 10 working days of acknowledgement, the person receiving the concern decides whether it falls under this policy or another procedure (such as grievance, malpractice or safeguarding), and whether it needs a formal investigation. You are told the decision and the reason.
3. **Investigation.** The investigator is someone with no involvement in the matter. Depending on the concern, UK Versity may involve its accountants, legal or HR advisers, the police, or the awarding organisation. Malpractice and maladministration concerns are investigated under UKV-QA-20 Malpractice and Maladministration Policy and Procedure and reported to the awarding organisation within its required timescale (see section 10).
4. **Feedback.** UK Versity aims to complete investigations within 30 working days. If it will take longer, you are told why and given a new date. You are kept informed of progress. UK Versity will tell you the outcome as far as it can without breaching the confidentiality or legal rights of others.
5. **Action.** The investigator reports findings and recommendations in writing to the Principal, or to the Quality Manager where the Principal is involved. Action may include disciplinary proceedings, changes to procedures, reporting to an awarding organisation, BAC, the police or another authority.
6. **Records.** A confidential record is kept of each concern, the investigation, the outcome and action taken.

If you are not satisfied with the outcome, you can ask for a review by writing to the Principal (or the Quality Manager where the Principal was involved) within 10 working days. You may also go to an external body in section 7.

7. External disclosure

UK Versity hopes you will raise concerns internally first, so that it can put things right. However, you are protected by law if you make a disclosure to a prescribed person about a matter within its remit, where you reasonably believe the information is substantially true. Prescribed persons relevant to UK Versity include:

Prescribed person	Type of concern
Ofqual (Office of Qualifications and Examinations Regulation)	Regulated qualifications, assessment, examinations and certification
Information Commissioner's Office (ICO)	Data protection and information rights
Health and Safety Executive (HSE)	Health and safety risks
HM Revenue and Customs	Tax and national insurance fraud

The full list of prescribed persons is published by the government on GOV.UK. You can also report concerns about qualifications directly to the relevant awarding organisation (section 10), and concerns about UK Versity's accreditation to the British Accreditation Council. Disclosure to the media or on social media is only protected in limited circumstances, so take independent advice first.

8. Protection and confidentiality

1. Nobody will suffer any detriment for raising a genuine concern, even if it turns out to be mistaken.
2. Anyone who victimises or threatens a person who has raised a concern, or who tries to stop a concern being raised, will face disciplinary action.

3. Your identity will not be disclosed without your consent unless the law requires it (for example a court order or a police investigation). If disclosure becomes necessary, UK Versity will discuss it with you first where possible.
4. If you believe you are being treated badly because you raised a concern, tell the Principal or the Quality Manager at once.
5. Personal data in whistleblowing records is handled under UKV-QA-29 and shared only with those who need it to investigate.

9. Roles and responsibilities

Role	Responsibility
Principal and Director of Education	Owns this policy; receives and investigates concerns; decides action; makes sure no one suffers detriment
Quality Manager and Lead IQA	Receives concerns, especially on assessment and malpractice; investigates concerns involving the Principal; reports malpractice to awarding organisations
Centre Coordinator	Supports reporting to BAC and IFA Direct where required
All managers	Pass any concern they receive to the Principal or Quality Manager the same working day; protect the person raising it
All staff and contractors	Raise concerns promptly; co-operate with investigations; keep matters confidential

10. Awarding organisation requirements

AO	Requirement / escalation route	Source document
ATHE (Awarding body for Training and Higher Education)	Suspected malpractice reported to ATHE within 5 working days of discovery. ATHE accepts allegations from whistleblowers, including anonymously, and protects the identity of the informant	ATHE Malpractice and Maladministration Policy (2023)
IFA Direct (Institute of Financial Accountants qualifications, administered in partnership with ATHE)	ATHE malpractice reporting applies	ATHE Malpractice and Maladministration Policy (2023)
Pearson Education Ltd (Pearson BTEC, including BTEC Higher Nationals)	Suspected malpractice reported to Pearson under JCQ Suspected Malpractice procedures	JCQ Suspected Malpractice Policies and Procedures (current edition)
NCFE (including NCFE CACHE and NCFE Functional Skills)	Suspected malpractice reported to NCFE immediately	NCFE Malpractice and Maladministration Policy PA-014 v1.1
OTHM Qualifications	Suspected malpractice reported to OTHM promptly	OTHM Malpractice, Maladministration and Investigations Policy v4.1 (August 2026)

AO	Requirement / escalation route	Source document
Ascentis (including Access to HE Diplomas)	Suspected malpractice reported to Ascentis under its current malpractice procedures	Ascentis malpractice policy (current edition)

11. Related policies and legislation

- UKV-QA-20 Malpractice and Maladministration Policy and Procedure
- UKV-QA-21 Conflict of Interest Policy
- UKV-QA-24 Complaints Policy and Procedure
- UKV-QA-25 Safeguarding and Prevent Policy
- UKV-QA-26 Equality, Diversity, Inclusion and Anti-Harassment Policy
- UKV-QA-27 Staff Recruitment, Induction and Development Policy
- UKV-QA-29 Data Protection and Records Retention Policy
- Public Interest Disclosure Act 1998 (Employment Rights Act 1996, Part IVA)
- Employment Rights Act 2025
- Equality Act 2010
- UK GDPR and Data Protection Act 2018
- Ofqual General Conditions of Recognition
- BAC College Scheme 2023, standard 3.5

12. Monitoring and review

The Principal keeps a confidential log of all whistleblowing concerns, their handling and outcomes, and reports anonymised figures and any lessons learned to the Academic Board at least annually. Staff awareness of this policy is checked at induction and appraisal.

This policy is reviewed at least annually, and earlier if legislation (including further commencement of the Employment Rights Act 2025), awarding organisation requirements, BAC standards, an inspection or EQA action, or a significant incident requires it. Each version is recorded in the Policy Register (UKV-QA-REG v3.0). Whistleblowing records are kept for 6 years after the case closes, under UKV-QA-29.

Approval and review

Stage	Name and role	Date
Prepared by	Director of Education	30 September 2026
Checked by (policy owner)	Principal	30 September 2026
Approved by	Ramanjeet Singh, Principal and Director of Education, on behalf of the Academic Board	1 October 2026
Next review due	Quality Manager (Shazia Khan) to schedule through the Policy Register UKV-QA-REG	September 2027