



Public Information Disclosure Act (“PIDA”) Whistle Blowing Policy & Procedures

Author	Clerk & Governance Advisor to the Corporation
Date	2025
Person Responsible	Clerk to the Corporation
Approval/review body	Corporate Board
Frequency of Review*	Annually

** Policies will be reviewed more frequently if legal changes or good practice require*

Review History:		
Date of review	Reviewed by	Reason for review
May 2013	Clerk	Completely updated in accordance with current legislation.
May 2017	Clerk	IAS Report - recommendations
Nov 2020	Clerk	Scheduled review
Nov 2021	Clerk	Schedule review
November 2023	Clerk	Scheduled review
19. November 2024	Clerk	Scheduled Review
20 November 2025	Clerk	Full revision to incorporate DfE 2025 governance guidance, procedures and model disclosure form

1. Introduction

North Kent College (“the College”) is committed to the highest standards of integrity, openness, and accountability.

This policy supports a culture where staff, governors, students, volunteers, contractors, and suppliers can raise serious concerns about wrongdoing without fear of reprisal.

This policy aligns with the Public Interest Disclosure Act 1998 (as amended) and the Department for Education (DfE) Governance and Accountability Framework (2025), ensuring that anyone who raises a legitimate concern in good faith is protected from detriment or victimisation.

The College encourages early disclosure of genuine concerns and undertakes to investigate all matters fairly, promptly, and confidentially.

2. Purpose and Scope

The purpose of this policy is to enable individuals to raise genuine concerns about wrongdoing or malpractice; protect whistleblowers from detrimental treatment; ensure all disclosures are handled fairly; and strengthen governance oversight.

This policy applies to all College employees (permanent, temporary, or agency), Senior Post Holders, Governors, volunteers, contractors, suppliers, students, or members of the public raising concerns about the College's conduct.

3. What Can Be Reported

A qualifying disclosure under this policy is information that an individual reasonably believes shows one or more of the following:

- A criminal offence (e.g., fraud, bribery, corruption, or abuse);
- A failure to comply with a legal obligation;
- A miscarriage of justice;
- A serious health and safety risk;
- Damage to the environment;
- Deliberate concealment of any of the above;
- A serious safeguarding concern; or
- A material governance, financial, or third-party transaction irregularity.

Personal employment grievances are not covered by this policy and should be pursued under the College Grievance Procedure.

4. Raising a Concern

Concerns should normally be raised as soon as possible through one of the following routes:

- Line Manager or Senior Post Holder;
- Chief Executive Officer (CEO);
- Deputy Chief Executive;
- Deputy Executive Principal (Teaching, Learning & Improvement); or
- Clerk & Governance Advisor to the Corporation.

Where the concern involves the Chief Executive Officer, it should be reported directly to the Chair of the Audit Committee, who acts as the designated Whistleblowing Governor.

Concerns may be raised verbally or in writing using the Model Whistleblowing

Disclosure Form (Appendix A). All concerns will be acknowledged and a confidential meeting offered to discuss the issue further. Written records will be kept securely by the Clerk.

The designated officer will decide whether the matter should be investigated internally, referred to external auditors or agencies, or reported to the Corporation Board or the Department for Education (DfE).

5. External Disclosures

The College encourages internal resolution but recognises that, in limited circumstances, disclosures may be made externally to:

- Department for Education (DfE) – Further Education Governance and Accountability Division;
- Office for Students (OfS);
- Health and Safety Executive (HSE);
- Serious Fraud Office (SFO);
- Public Concern at Work / Protect (independent whistleblowing charity).

Going directly to the media will not normally constitute a protected disclosure and may lead to loss of legal protection. Individuals are advised to seek independent advice before doing so.

6. Safeguards and Protection

No individual will suffer detriment for raising a genuine concern in good faith. Retaliation or victimisation of a whistleblower will be treated as a disciplinary offence.

Malicious or knowingly false disclosures may also lead to disciplinary action. Where requested, anonymity will be respected as far as legally possible. Support and advice will be offered to anyone raising a concern.

7. Confidentiality and Data Protection

All disclosures will be treated in confidence, with information shared only on a need-to-know basis.

Records will be maintained in line with the UK GDPR and Data Protection Act 2018.

Statistical summaries will be provided to the Audit Committee without identifying individuals.

8. Monitoring and Reporting

The Clerk & Governance Advisor will maintain a confidential register of all disclosures.

The Chief Executive Officer and Chair of Audit Committee will receive regular assurance reports on whistleblowing activity.

The Audit Committee will receive an annual anonymised report summarising disclosures.

Serious incidents will be reported to the Corporation Board and, if appropriate, the Department for Education (DfE) or Charity Commission.

9. Procedure for Handling a Disclosure

Stage 1 – Receipt of Disclosure (Within 5 Working Days)

Acknowledge receipt, log disclosure, and confirm scope. Referral to Chair of Audit Committee if concern involves CEO.

Stage 2 – Preliminary Review (Within 10 Working Days)

Initial fact-finding and determination of next steps. Inform whistleblower of preliminary outcome.

Stage 3 – Formal Investigation (Within 30 Working Days)

Investigation by appointed officer, independent HR consultant, or Internal Auditors. Regular updates provided every 15 working days.

Stage 4 – Outcome and Decision (Within 10 Working Days)

Investigating Officer report submitted to CEO or Chair of Audit Committee. Determine substantiation and actions required.

Stage 5 – Appeal (Within 15–20 Working Days)

If dissatisfied, whistleblower may appeal in writing to Chair of Corporation. Final decision issued within 20 working days.

Stage 6 – Reporting and Assurance

Anonymised termly reports to Audit Committee and annual summary to Corporation Board. Serious incidents reported to DfE and Charity Commission.

Indicative Timeline Summary

Stage	Action	Responsible	Indicative Timescale
1	Acknowledge disclosure	Clerk / Designated Officer	Within 5 working days
2	Preliminary review	Clerk / CEO / Chair of Audit	Within 10 working days
3	Formal investigation	Appointed Investigator	Within 30 working days
4	Outcome and decision	CEO / Chair of Audit	Within 10 working days
5	Appeal (if requested)	Chair of Corporation	Within 15–20 working days
6	Report to Audit Committee	Clerk & Governance Advisor	Termly / Annually

Appendix A – Model Whistleblowing Disclosure Form
STRICTLY CONFIDENTIAL

Public Interest Disclosure – Whistleblowing Report

Name (optional)	
Role / Department	
Date of Disclosure	
Nature of Concern (tick all that apply)	<input type="checkbox"/> Fraud / Corruption <input type="checkbox"/> Safeguarding <input type="checkbox"/> Health & Safety <input type="checkbox"/> Financial Irregularity <input type="checkbox"/> Breach of Legal Duty <input type="checkbox"/> Environmental Issue <input type="checkbox"/> Governance Misconduct <input type="checkbox"/> Other
Description of Concern (include dates, locations, and individuals involved)	
Evidence or Supporting Information (attach if available)	
Has this concern been raised before? If yes, please provide details	
Who have you already reported this to (if anyone)?	
Do you wish to remain anonymous?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Signature (if applicable)	
Date	

Please return this form to:
Clerk & Governance Advisor to the Corporation
North Kent College
Email: yolandahughes@northkent.ac.uk

Related Policies and Documents

- Staff Code of Conduct
- Anti-Fraud, Bribery & Corruption Policy
- Safeguarding Policy & Procedures
- Financial Regulations
- Modern Slavery & Human Trafficking Statement
- Conflicts of Interest and Third-Party Transactions Policy