



Employee Public Interest Disclosure (Whistleblowing) Policy and Procedure

This is a B&FC Group policy and procedure

Date approved:	3 August 2026
Approved by:	Executive
Responsible Manager (s):	Director of People and Payroll
Executive Lead:	Chief Commercial and People Officer

Applicable to employees:	Yes
Applicable to students and apprentices:	No
Accessible to students and apprentices:	Yes
Accessible to general public: (including clients)	Yes

Consultation

Consultation undertaken with: Trade Unions, CLT, CRG

Date: August 2026

Policy review frequency, normally: 2 years

Employee Public Interest Disclosure (Whistleblowing) Policy

1. Scope and purpose

- 1.1 This policy applies to all employees of Blackpool and The Fylde College Group and provides a framework for raising concerns about serious wrongdoing or malpractice in the public interest. It reflects the College's commitment to openness, integrity, and accountability and aligns with the Public Interest Disclosure Act 1998 (PIDA), which protects workers who disclose certain types of information in good faith.
- 1.2 This policy does not apply to students, other stakeholders or members of the public. These are covered by the B&FC Complaints Policy and Procedure.
- 1.3 This policy does not apply to personal grievances concerning an individual's terms and conditions of employment, or other aspects of the working relationship, complaints of bullying or harassment, or disciplinary matters. Such complaints will be dealt with under existing B&FC procedures on grievance resolution, respect and consideration for others and discipline.

2. Policy Statement

- 2.1 Under the PIDA, a qualifying disclosure is one where an employee reasonably believes that one or more of the following has occurred, is occurring, or is likely to occur:
 - a criminal offence including fraud
 - a breach of a legal obligation
 - a miscarriage of justice
 - a danger to the health and safety of any individual
 - damage to the environment
 - a deliberate attempt to conceal any of the above
- 2.2 This policy is intended only for reporting serious wrongdoing or malpractice in the public interest, not for challenging financial or business decisions.
- 2.3 Employees should raise concerns internally first so the College can investigate, specifying which of the six qualifying disclosures under the Public Interest Disclosure Act applies; submit the Statement of Concern Form (Appendix 1 or download link) and email it to the Director of People and Payroll (or a designated manager in their absence). Full details are set out in the Employee Public Interest Disclosure (Whistleblowing) Procedure.
- 2.4 Confidentiality will be maintained as far as possible; anonymous disclosures are harder to investigate but may be considered where there is sufficient evidence.

3. External disclosures and protection for whistleblowers

- 3.1. Employees are expected to use the whistleblowing (internal disclosure) procedure first so concerns can be addressed within B&FC. If there is a genuine reason not to pursue the internal route, or if, after doing so, the concern remains unresolved, employees may raise the matter with a prescribed external body listed on GOV.UK, informing the Director of People and Payroll beforehand.

- 3.2. External disclosures should only be made where the concern can be substantiated, and internal options have been reasonably explored.
- 3.3. Employees are expected to raise concerns internally in the first instance, as external disclosures must meet stricter statutory tests to qualify for protection under the Public Interest Disclosure Act (PIDA). External disclosures may still be protected where these statutory conditions are satisfied, and no disciplinary action will be taken against an employee who makes a protected disclosure. Employees must maintain confidentiality at all times and may seek confidential legal advice at any time
- 3.4. Employees who raise genuine concerns in good faith are protected under the Public Interest Disclosure Act (PIDA) and will not suffer any detriment. They may seek confidential legal advice at any time. For independent advice, employees can contact Protect at www.protect-advice.org.uk.
Whistleblowing Advice Line: 020 3117 2520

4. Accountability

- 4.1 The Director of People and Payroll (or nominated deputy) is responsible for maintaining and updating this policy to ensure compliance with legislation.
- 4.2 Employees are responsible for raising concerns appropriately and maintaining confidentiality throughout the process.

5. Student Involvement

- 5.1 There is no direct student involvement in this policy.

6. Linked Policies and Procedures

- Respect and Consideration for Others Policy
- Employee Grievance Policy
- Employee Disciplinary Policy
- Employee Public Interest Disclosure (Whistleblowing) Procedure
- Statement of Concern Form (Appendix 1)
- Complaints Policy and Procedure

7. Application and scope of the procedure

- 7.1 Blackpool and The Fylde College's (B&FC) Employee Public Interest Disclosure (Whistleblowing) Procedure establishes a framework to address qualifying disclosures raised in relation to the specific issues which are in the public interest and are detailed in 7.3 below, and which fall outside the scope of other B&FC policies and procedures.
- 7.2 This procedure does not apply to personal grievances concerning an individual's terms and conditions of employment, or other aspects of the working relationship, complaints of bullying or harassment, or disciplinary matters. Such complaints will be dealt with under existing B&FC procedures on grievance resolution, respect and consideration for others and discipline.
- 7.3 The policy and procedure seeks to address specific concerns which are in the public interest and specifically where an employee has a reasonable belief that one of the following has occurred or is likely to occur:
- a criminal offence including fraud
 - a breach of a legal obligation
 - a miscarriage of justice
 - a danger to the health and safety of any individual
 - damage to the environment
 - a deliberate attempt to conceal any of the above
- 7.4 The Act is not designed to support a claim from an employee about a breach of their own contract of employment and such issues should be dealt with via B&FC's Employee Grievance Resolution procedure.
- 7.5 This procedure allows employees of B&FC to raise concerns or to disclose information which the employee believes shows malpractice or impropriety. It is not designed to question financial or business decisions taken by the College.
- 7.6 If during an investigation any concern raised appears to the investigating manager to relate more appropriately to a grievance, respect and consideration for others, or discipline, this will be discussed with the Director of People and Payroll and the relevant B&FC policy and procedure will be invoked, instead of or, where appropriate, in addition to this procedure.

8. Procedure for raising a concern

- 8.1 When raising a concern, the discloser is to raise their concerns internally in the first instance. This will enable the College to investigate the concerns and identify the appropriate course of action.
- 8.2 When raising concerns the discloser must declare any personal interest they have in the matter.
- 8.3 The discloser must also clarify which of the six qualifying disclosures identified at

2.1 of the Employee Public Interest Disclosure (Whistleblowing) Policy are being infringed and why there is a reasonable belief of wrong doing which is in the public interest to disclose.

- 8.4 To raise a concern, the Statement of Concern form (**Appendix 1**) is to be completed and forwarded by email to the Director of People and Payroll, or in their absence a People team Manager. It is important that the discloser provides clear details on this form, describing the misconduct/improper activity, setting out the facts which give rise to these concerns, who they believe to be involved, and provide as much evidence as possible in order to support a clear investigation.
- 8.5 The Director of People and Payroll, or in their absence a People Team Manager will acknowledge receipt of the completed Statement of Concern form.
- 8.6 Confidentiality will be maintained so far as is reasonably possible, but there may be circumstances where the identity of a 'discloser' would need to be revealed in order to gain the protection of the Public Interest Disclosure Act.
- 8.7 Accusations made anonymously are difficult to follow up and substantiate and are not normally investigated. However, B&FC reserves the right to determine whether to apply this policy in respect of anonymised disclosures in light of the following considerations, providing there are sufficient grounds disclosed:
- The seriousness of the issues raised in the disclosure;
 - The credibility of the concern;
 - How likely it is that the concern can be confirmed from attributable sources.
- 8.8 In all cases the Director of People and Payroll will determine whether the evidence supports that the disclosure is wholly with or without substance or merit. If it is considered that the disclosure does not have sufficient merit to warrant further action, the employee, will be notified in writing of the broad reasons for the College's decision and advised that no further action will be taken under this policy and procedure. Considerations to be taken into account when making this determination may include the following:
- If it is considered that an employee does not have a reasonable belief that suspected malpractice is occurring; or
 - If the matter is already the subject of legal proceedings or appropriate action by an external body; or
 - If the matter is already subject to another, appropriate B&FC procedure.
- 8.9 When an employee makes a disclosure which is considered to have sufficient substance or merit warranting further action, B&FC will take the relevant action it deems appropriate including action under any other applicable B&FC policy or procedure. Possible actions could include internal investigation; referral to the B&FC auditors; or referral to relevant external bodies such as the police, ESFA, Health and Safety Executive or the Information Commissioner's Office.
- 8.10 All internal investigations will be conducted by an independent manager of B&FC without any direct association with the individual/s to whom the disclosure relates. If it is deemed more appropriate, an external investigator may be appointed.

- 8.11 Due to the nature of investigations of this type it is not possible to stipulate specific timescales. However, the discloser will be kept appropriately informed of the progress.
- 8.12 The investigating manager will consider all the matters raised during the investigation along with any additional information obtained via investigation.
- 8.13 Any recommendations for further action made by the investigation manager will be provided to the ~~Principal~~ and Chief Executive. Where any disclosures involves the ~~Principal~~ and Chief Executive the disclosure will be made to the Clerk to the Corporation Board.
- 8.14 The employee making the disclosure will be communicated appropriately under this policy and procedure within a reasonable period of time.

9. External disclosure

- 9.1 The Employee Public Interest Disclosure (Whistleblowing) Policy has been implemented to allow employees to raise disclosures internally within B&FC.
- 9.2 B&FC employees are expected to follow the Employee Public Interest (Whistleblowing) Disclosure procedure in the first instance rather than air any potential qualifying public interest concerns outside of B&FC. Any employee who chooses to make a disclosure outside B&FC (including for example, to the press) without first using the procedure may not be protected under the Act and may be subject to internal B&FC disciplinary procedures.
- 9.3 If the employee believes this procedure has not been followed or disclosures have not been investigated thoroughly, they may make a disclosure to an appropriate external body prescribed by the law. This list of 'prescribed' organisations and bodies can be found on the GOV.UK website. Before taking any such action the employee will inform the Director of People and Payroll in writing.
- 9.4 Disclosure outside the organisation to, for example, regulatory bodies, the police, media or a member of parliament, is the last resort and only where the discloser honestly and can reasonably substantiate that the allegations are true and there is good cause and justification for not pursuing matters internally
- 9.5 The employee making the disclosure may at any time disclose the matter on a confidential basis to a professional legal advisor for the purpose of taking legal advice. If an employee seeks advice outside of B&FC, they must ensure that they comply at all times with their confidential obligations. Any unjustified breach of confidentiality will be dealt with as a separate disciplinary matter.

Withdrawal of a public interest disclosure

- 9.6 Where an employee wishes to withdraw a disclosure after the procedure has commenced they should provide written confirmation of their intention to the Director of People and Payroll, at the earliest available opportunity, along with their reason.
- 9.7 B&FC reserves the right to continue to proceed with or investigate a situation in accordance with an associated duty of care or obligation.

10. Public interest disclosure against the People team

- 10.1. Any formal concern/s against any member of the People team should be made in writing to the member of the Executive team to whom the Director of People and Payroll reports, currently the Chief Commercial and Payroll Officer

11. Support during the procedure

- 11.1 Both employees lodging a claim and those subject to a formal allegation may be allocated an independent support contact from the People team. The People team support cannot advise on how the employee should present their concern, what details to disclose or how to answer queries as this is the responsibility of the employee.
- 11.2 Whilst there is no direct student involvement in this procedure, there may be occasions where a student is required to give evidence. On such occasions, the student will be fully and appropriately supported.
- 11.3 B&FC aims to encourage openness and will support employees who raise genuine concerns in good faith under the Employee Public Interest Disclosure (Whistleblowing) Policy. Any employee making a disclosure will be afforded protection under the Public Interest Disclosure Act 1998 and will not suffer any detrimental treatment as a result of raising a concern without malice. Further information and guidance can be found on the Employee Portal.
- 11.4 Employees can also contact the charity Protect for confidential advice on public disclosure issues. Contact details are as follows:

The Green House

244-254 Cambridge Heath Road
London E2 9DA

Whistleblowing Advice Line: 020 3117 2520
www.protect-advice.org.uk

- 11.5 No formal disciplinary action will be taken against an employee on the grounds of making a disclosure made under this policy. However if evidence of malicious or vexatious allegations are found, or where a disclosure is made outside of B&FC process without reasonable grounds, B&FC may recommend an investigation under the B&FC's Staff Disciplinary Policy. A disclosure may be declared malicious or vexatious at any stage of the procedure.

Appendix 1: Statement of Concern form

Note: An employee submitting a disclosure should carefully read the Employee Public Interest Disclosure (Whistleblowing) Policy and Procedure before completing this form.

The reports contact information	
This section may be left black if the reporter wish to remain anonymous	
Name of employee	
Curriculum or Service Area	
Job title	
Employee to whom the disclosure relates	
Name of employee	
Curriculum or Service Area	
Job title	
Details of disclosure	
<i>Briefly describe the alleged misconduct/improper activity and how you know about it. Specify what, who, when, where and how. Provide details of any evidence that you can provide, and if there are any other parties involved other than the suspect named above.</i>	

Signature of employee: _____

Date: _____

Equality Impact Assessment

Impact Assessment for the 4 strands of Equality, Safeguarding, Health and safety and Sustainability

Initial Form to be completed with Risk Assessments or as part of a proposal or change to a policy, plan or new way of working

Title of Activity: Employee Public Interest Disclosure (Whistleblowing) Policy and Procedure
Name and title of proposer: Director of People and Payroll

Revision or New Revision

Equality and Diversity.

Are there students, apprentices, other customers, community/stakeholders, and/or colleague concerns that the proposed policy, project or change may be discriminatory or have an adverse impact on people with protected characteristics?

A	Students/Apps/Customer	N	If so, how many individuals / which groups of are likely to be affected?	
B	Community/stakeholders	N		
C	Colleague	N		

Equality group	Positive impact High Low None	Negative impact High Low None	Reason / comments for positive impact why it could benefit any /all of the equality groups	Reason /comments for negative impact /what could disadvantage any/all of the equality groups
Gender (Men/women/Non-binary/Transgender)	None	None		
Age	None	None		
Race or ethnicity	None	None		
Learning difference	None	None		
Physical and/or sensory disability	None	None		
Mental health need	None	None		
Sexual Orientation	None	None		
Religion and Belief	None	None		
Marriage and civil partnership	None	None		
Pregnancy and maternity	None	None		
Carers/care experienced	None	None		
Socio Economic deprivation indicators	None	None		
Applies to ALL groups	None	None		

What changes or actions do you recommend to improve the service, project, policy, or change to eradicate or minimise the negative impacts identified? Who will be responsible for monitoring these actions? N/A

Have students, apprentices/other customers, communities and/or colleagues been consulted in the review / proposed change?

A	Students/Apps/Customers	No
B	Community	No
C	Colleague	No
	If yes, who and how many have you involved and how have they been involved?	Student representatives through elected members of student Union. Managers through CLT, recognised trade unions, Colleague Representation group Members of Exec

Safeguarding: Are there any aspects of this proposal which could cause a Student/member of staff/visitor to feel unsafe? If yes, how has this been considered? What are the risks? What are the benefits?

No

Health and Safety: Have any risks been identified? If yes, how has this been considered? What are the risks? What are the benefits?

No

Sustainability: Are there expected benefits or impacts on sustainability issues? If yes, how have these been considered?

No

Evidence: What evidence do you have for your conclusions and expectations for these conclusions? How will this impact be monitored for all these considerations?

N/A

Is this policy of a high/medium or low risk?:

Low