



076. Whistleblowing Policy

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| Policy owner: | Academic Director (CEO) |
| Version No.: | 2.0 |
| Review cycle: | Annually |
| Approval route: | Board of Governors |
| Publication route: | External (IFG website) |
| Latest publication date: | 13.02.2026 |

Statement and Purpose

International Foundation Group (IFG) is committed to honesty, integrity, openness and accountability. We expect our students, staff and our community as a whole to maintain high standards, in accordance with our policies and procedures.

IFG understands that all organisations face the risk of things going wrong or of unknowingly harbouring illegal or unethical conduct and strives to develop a culture of openness and accountability.

The Public Interest Disclosure Act 1998 (<https://www.legislation.gov.uk/ukpga/1998/23/contents>) gives legal protection to staff, including employment agency workers and those on work experience, against being dismissed or penalised as a result of disclosing information which, in the reasonable belief of that member of staff, is in the public interest to disclose and tends to show specified types of malpractice, wrongdoing or dangers.

This disclosure is commonly known as 'whistleblowing'.

Principles

This policy provides a fair and consistent means of dealing with concerns raised by staff by the following principles:

1. Confidentiality: Whistleblowers' identities will be protected where possible.
2. Protection: No retaliation against those who raise concerns in good faith.
3. Impartiality: All reports will be investigated fairly and thoroughly.
4. Transparency: The process for investigation and resolution is clearly outlined.

Please note that there are existing procedures in place to enable you to lodge a grievance relating to your own employment.

Scope

This Policy applies to all directors, students, employees, contractors, agents and other stakeholders who are engaged to work for the IFG.

The policy applies to all types of concern for example:

- Financial misconduct (e.g., fraud, embezzlement)
- Academic dishonesty or research misconduct
- Breaches of legal or regulatory requirements
- Health and safety risks
- Discrimination, harassment, or abuse
- Other unethical or improper conduct

Definitions

The term 'whistleblowing' refers to the reporting of a serious concern in the workplace by an employee of the institution, that is in the public interest (a 'public interest disclosure').

Employees are often the first to notice that something is wrong within an organisation but may be worried about raising their concerns for fear of being discriminated against or victimised. Sometimes they feel they are being disloyal to a colleague or manager, or they believe that their concerns will not be taken seriously or that action will not be taken to address their concerns.

It is recognised that raising a concern through the whistleblowing route can be a very difficult decision to make. Therefore, you can ask to have an informal discussion in the first instance with any member of the senior management team and/or HR department to talk through how the whistleblowing process works.

This will also reassure you that IFG will not treat you unfairly, and it will act quickly to investigate the issue. Any concerns raised will always be treated seriously and where possible your identity will be protected.

The Whistleblowing Policy is not for raising personal complaints relating to issues such as bullying or harassment or issues concerning your terms and conditions of employment.

'Whistleblowing' refers to the disclosure by individuals of suspected malpractice, illegal acts or omissions at work. Examples of the types of concerns that may be raised include:

- Possible criminal activity, fraud or irregularities
- Failure to comply with legal obligations or regulatory requirements
- Unauthorised use of public funds or other assets or improper accounting practices
- Offering, taking or soliciting bribes
- Theft or misuse of property or assets
- Racial, sexual, disability or other discrimination
- Suspicion of radicalisation (*)
- Health and Safety concerns
- Damage or potential damage to the environment
- Data protection or information security breaches

- Unauthorised disclosure of confidential information
- Conduct likely to damage the College's reputation
- Unethical conduct
- Actions which are intended to conceal any of the above

This list is not exhaustive and simply representative of the types of concerns which may be raised.

(*) As an education provider, IFG has a legal requirement to comply with the Government's 'Prevent Strategy' aimed at preventing radicalisation. See also IFG's Prevent Policy.

IFG will do this by escalating incidences and concerns using our safeguarding processes and we promote Equality & Diversity and British Values with our students to help ensure they are integrated into mainstream society and are less vulnerable to radicalisation and extremism.

Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal your identity if you so wish. At the appropriate time, you may need to come forward as a witness.

Anonymous Allegations

You can inform us anonymously but we may not be able to take the claim further if you have not provided all the information we need.

Untrue Allegations

If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you. If, however, you make an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against you.

Roles and Responsibilities

IFG's Board through its Risk, Audit and Compliance Committee has overall responsibility for overseeing the effectiveness of this Policy.

The Quality and Compliance Director is responsible for the effective operation of this policy and for reviewing the application of actions taken in response to concerns raised under this policy. Any questions about this policy should be directed to them in the first instance. IFG's Academic Director will ensure that regular and appropriate training is provided to all managers who may deal with concerns or investigations under this Policy.

IFG will keep a register of disclosures made under this policy and shall submit to the Risk, Audit and Compliance Committee as part of the yearly reporting cycle along with a report of all disclosures and any actions taken.

Procedure

How to Raise a Concern

Concerns may be raised verbally or in writing, you should if possible provide the background and history of the concern (giving relevant dates) and the reason why you are particularly concerned about the situation.

Although you are not expected to prove beyond doubt the truth of an allegation, you will need to demonstrate to the appointed investigator that there are reasonable grounds for your concern.

What is expected of those raising a concern

Employees making a disclosure are expected to have a reasonable suspicion about the malpractice and a reasonable belief that the information and any allegation is true and not make the disclosure for personal gain.

Protection for those raising a concern

In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The action taken by the IFG Board of Governors will depend on the nature of the concern. The matters raised may be investigated internally referred to the Police and/or subject of an independent inquiry.

Anyone notified of a concern must

- ensure that concerns are taken seriously, treated sensitively and without undue delay
- investigate properly noting relevant details and collect any documentary evidence before making an objective assessment of the concern
- keep the whistleblower advised of progress
- ensure that the action necessary to resolve a concern is taken.

Concerns or allegations that fall within the scope of existing procedures e.g. Fraud Prevention Policy, Anti-Bribery and Corruption Policy, will normally be referred for consideration under those procedures.

The person investigating the concerns will write to tell the whistleblower within ten working days to:

- acknowledge receipt of the concern
- indicate how IFG will deal with the matter
- supply information about the process giving an estimate of how long it will take to provide a final response
- supplying you with information on staff support mechanisms
- telling you whether further investigations will take place and if not, why not.

If you are not satisfied with the way in which the investigation has been carried out, you may raise your concerns with the Academic Director or other senior management role.

Investigating Procedure

Action taken will depend upon the nature of the concern. Disclosures will be assessed to determine whether a further investigation should be conducted, the form the investigation should take and appoint an investigating officer to undertake the investigation.

The discloser will, as far as possible, be kept informed of progress and, if appropriate, the final outcome of the investigation

The investigating officer will provide the IFG Board of Governors with a full and detailed report of the findings and recommendations for consideration.

Confidential records will be maintained for monitoring purposes.

External Reporting

This policy has been developed in order to provide employees with the guidance and reassurance they need to raise a concern internally. However, it is recognised that there may be circumstances where employees feel it necessary to raise their concerns outside the business and in these circumstances employees have a number of external avenues open to them.

Protect (formerly Public Concern at Work)

Protect is the UK's whistleblowing charity, aiming to protect workers' rights and organisations' reputations, by encouraging safe and responsible whistleblowing.

Protect contact details: T: 020 3117 2520

Website: <https://protect-advice.org.uk>

Employees can also raise their concerns with the proper authorities by using the government link. This link also contains all the protection laws and guidance available to an employee:

<https://www.gov.uk/whistleblowing>

The list includes:

Environment Agency

Financial Services Agency

HR Revenue and Customs,

Information Commissioner

Health & Safety Executive and,

Pensions Regulator.

Outcomes

Depending on the findings of the investigation, outcomes may vary from no further action at all to sanctions against perpetrators. Such sanctions may range from a verbal warning to dismissal without notice in cases of gross misconduct and criminal prosecution.

Offences committed as determined by the Bribery Act 2010 carry severe penalties including unlimited fine or up to 10 years imprisonment.

Communication

This Whistleblowing Policy is communicated during induction of new staff and shared on the website when updated and is provided to all students and staff to ensure that they are aware of their obligations and responsibilities as part of their respective induction processes.

Monitoring and Review arrangements

IFG will review the policy bi-annually in line with our requirements to meet the regulations set by the Office for Students (OfS) and will revise as and when necessary to ensure it remains fit for purpose.

Associated Policies

IFG has a number of other policies which interact and overlap with the Whistleblowing Policy, including but not limited to:

- Student Complaints Policy
- Appeals Policy
- Non-Academic Misconduct Policy
- Academic Misconduct Policy
- Sexual Misconduct and Harassment Policy
- Anti-Bribery and Corruption Policy
- Fraud Prevention Policy
- Health and Safety Policy and associated Regulations
- Business Continuity Policy