Whistleblowing (Public Interest Disclosure) Policy

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Regulatory Alignment with Office for Students (OfS) Conditions

The Whistleblowing (Public Interest Disclosure) Policy forms a key part of the London Academy for Applied Technology's (LAAT) governance, risk management, and accountability framework, supporting a culture of openness, integrity, and responsible institutional conduct.

The policy aligns with OfS Condition E1 (Public Interest Governance) and E2 (Management and Governance) by establishing clear arrangements for the reporting, investigation, and oversight of concerns relating to misconduct, malpractice, and regulatory non-compliance. It strengthens institutional controls by ensuring that risks are identified, escalated, and managed appropriately through defined governance structures and committee oversight.

The policy also supports OfS Condition E3 (Accountability) by setting out documented procedures for recording disclosures, monitoring outcomes, and reporting to senior management and governing bodies, thereby demonstrating effective institutional responsibility and regulatory compliance.

In addition, the policy aligns with OfS Condition C1 (Consumer Protection) and C5 (Treating Students Fairly) by ensuring that students and staff are provided with clear, accessible, and transparent information on how to raise concerns, how disclosures will be handled, and how individuals will be protected from unfair treatment or victimisation.

This policy is informed by relevant sector reference points, including the UK Quality Code for Higher Education and public interest disclosure legislation, and is implemented through LAAT's governance, safeguarding, and quality assurance arrangements to ensure consistency, fairness, and effective institutional oversight.

Terms of Reference

1. Purpose

This Whistleblowing Policy sets out LAAT's commitment to ensuring a culture of openness, transparency, and accountability by providing a clear process for raising concerns in the public interest. It exists to protect individuals who disclose information about malpractice, wrongdoing, or risks to students, staff, or the reputation of the Academy.

2. Scope

This policy applies to all governors, employees, students, contractors, volunteers, and third parties working with or for LAAT. It covers disclosures of concerns related to unlawful conduct, financial irregularities, health and safety risks, safeguarding issues, academic integrity breaches, regulatory non-compliance, and other matters affecting public interest.

3. Legislative and Regulatory Framework

This policy has been developed in accordance with:

- Public Interest Disclosure Act 1998
- Employment Rights Act 1996 (as amended)
- OfS Regulatory Framework and Conditions of Registration
- Relevant UK employment and education statutes

LAAT also ensures compliance with applicable UK whistleblowing protections and best practice guidance.

4. Definition of Whistleblowing

For the purposes of this policy, *whistleblowing* is the reporting by staff, students, or third parties of concerns about wrongdoing that:

- Poses a risk to public interest, students, employees, or stakeholders
- Involves illegal, unethical, or improper conduct
- Represents a breach of legislation, regulatory obligation, or LAAT policy

This may include (but is not limited to):

- Fraud, corruption, bribery, or financial misconduct
- Health & safety violations
- Safeguarding concerns
- Academic malpractice
- Bullying, harassment, discrimination
- Misuse of Academy assets or data

5. Principles

LAAT is committed to:

- **Openness and transparency**: fostering a culture where raising concerns is encouraged.
- **Protection from retaliation**: ensuring whistleblowers are protected from victimisation or detriment.
- **Confidentiality**: handling all disclosures sensitively and, where requested, confidentially.
- **Fairness and impartiality**: investigating concerns objectively and without bias.

6. Reporting a Concern

Persons with a whistleblowing concern should report it as soon as possible through one of the following routes:

6.1 Internal Reporting Channels

- Line Manager
- Academic Dean
- Governance Office
- Designated Whistleblowing Email**:** **whistleblowing@laat.ac.uk**

6.2 What to Include in a Report

Reports should, where possible, include:

- Description of the concern
- Dates, times, locations
- People involved
- Relevant evidence or documentation

LAAT welcomes concerns raised in good faith, whether verbally or in writing.

7. Standard Operation Procedure (SOP)

This Standard Operating Procedure (SOP) sets out how London Academy for Applied Technology (LAAT) receives, assesses, investigates, and responds to whistleblowing disclosures made in the public interest. It ensures that concerns are handled confidentially, fairly, and proportionately, in accordance with LAAT's governance arrangements, employment policies, and Office for Students (OfS) expectations for effective institutional management, accountability, and regulatory compliance. The procedure also supports alignment with Plymouth Marjon University's partner governance, safeguarding, and quality assurance requirements.

Stage 1 — Acknowledgement
On receipt, LAAT will acknowledge the report within **5 working days** and outline next steps.
Stage 2 — Risk Assessment

The Governance Office, in consultation with HR where appropriate, will assess the seriousness of the concern and determine the appropriate investigation approach.

Stage 3 — Formal Investigation

An investigation will be conducted according to LAAT procedures. This may involve interviews, document review, specialist advice, and risk identification.

Stage 4 — Outcome

Findings will be communicated to the whistleblower (where contact details are provided) and relevant managers. Appropriate corrective actions or referrals will be taken.

Stage 5 — Closure and Monitoring

Outcomes will be reported to the Audit, Risk & Governance Committee for oversight and trend monitoring.

8. Confidentiality and Anonymity

LAAT aims to keep identities confidential. However:

- Absolute confidentiality cannot be guaranteed if legal obligations require disclosure (e.g. safeguarding).
- Anonymous reports will be considered if evidence is sufficient to warrant investigation, but anonymous concerns may limit the Academy's ability to fully investigate.

9. Protection from Retaliation

No person making a protected disclosure in good faith will be subject to dismissal, disciplinary action, harassment, or other forms of retaliation. Any such actions against a whistleblower will themselves be treated as a serious disciplinary matter.

10. Malicious or False Allegations

Deliberately false or malicious allegations, where made knowingly or recklessly, may result in disciplinary action against the individual making the claim.

11. Appeals

If a whistleblower is dissatisfied with how a concern was handled, they may raise an appeal in writing within **28 days** of being informed of the outcome. Appeals should be addressed to **the Governance Office** and will be considered independently.

12. External Disclosure

If internal reporting does not resolve the concern, or if the whistleblower reasonably believes it is appropriate, disclosures may be made to prescribed external bodies (e.g., regulators, law enforcement, OfS, UK Anti-Corruption Unit) in line with public interest disclosure legislation.

13. Monitoring and Review

This policy will be reviewed annually by the **Audit, Risk & Finance Committee** and updated as necessary. Regular reports on whistleblowing cases and trends will be provided to senior governance bodies.

14. Responsible people / Roles include

- **Dean (Policy Owner): Dr Manoj Ponugubati**
  Overall responsibility for implementing, monitoring, and reviewing the Whistleblowing Policy.
- **Governance and Compliance Lead: Dr Abul Hossain**
  Oversees operational delivery, procedural compliance, and regulatory alignment.
- **Registry and Administration: Mr Stephen Plant**
  Manages confidential records, communications, and case administration.
- **Audit, Risk & Finance committee officer: Mr Nahid Aminul**
  Provides independent oversight and reports to the Audit and Risk Committee.
- **Investigation Officer / Panel (Independent)**
  Conducts impartial investigations and determines outcomes.
- **Staff, Students, and External Stakeholders**
  Raise concerns in good faith in line with this Policy.

List of people and contacts

Role	Name	Contact email
Dean	Dr Manoj Ponugubati	manoj@laat.ac.uk
Governance Lead	Dr Abul Hossain	Mdabul.hossain@laat.ac.uk
Register	Mr Stephen Plant	Stephen.plant@laat.ac.uk
ARFC officer	Mr Nahid Aminul	Nahid.aminul@laat.ac.uk

15. List of Documents

- Whistleblowing Disclosure / Concern Report Form
- Investigation Report Template
- Confidential Case Log and Register
- Appeals and Review Procedure
- Anti-Bribery and Corruption Policy
- Staff Code of Conduct
- Safeguarding Policy
- Complaints and Grievance Policy

16. Evidence

Mapping table for the evidence items related to OfS conditions

Evidence Item	Purpose / What it Demonstrates	Relevant OfS Condition(s)
Whistleblowing Disclosure / Concern Report Form	Provides a formal, confidential mechanism for staff, students, and stakeholders to report concerns in the public interest	E1 (Public interest governance), E2 (Management and governance), E3 (Accountability)
Investigation Report Template	Documents investigation processes, findings, and recommendations, ensuring consistent and fair handling of disclosures	E2 (Management and governance), E3 (Accountability)
Confidential Case Log and Register	Maintains secure records of disclosures, actions taken, and outcomes, supporting governance oversight and audit assurance	E2 (Management and governance), E3 (Accountability), F2 (Information controls)
Appeals and Review Procedure	Provides a structured mechanism for reviewing whistleblowing outcomes and procedural fairness	C1 (Consumer protection), C5 (Treating students fairly), E3 (Accountability)
Anti-Bribery and Corruption Policy	Supports the prevention, detection, and reporting of financial misconduct and improper practices	E8 (Fraud and misuse of funds – initial), E2 (Management and governance), E1 (Public interest governance)
Staff Code of Conduct	Defines expected ethical standards and professional behaviour, reinforcing integrity and accountability	E1 (Public interest governance), E2 (Management and governance)
Safeguarding Policy	Ensures protection of vulnerable individuals and appropriate handling of safeguarding disclosures	E6 (Harassment and sexual misconduct), E2 (Management and governance)
Complaints and Grievance Policy	Provides fair and transparent procedures for resolving concerns where whistleblowing is not appropriate	C1 (Consumer protection), C5 (Treating students fairly), E2 (Management and governance)