

HiQual UK

WHISTLEBLOWING POLICY

HQUK-POL-WB-001

Document Control Item	Details
Organisation	HiQual UK
Policy Title	Whistleblowing Policy
Policy Reference	HQUK-POL-WB-001
Version	1.0
Policy Status	Approved
Effective Date	1 June 2026
Next Review Date	1 June 2027
Policy Owner	Sarah Williams, Head of Quality Assurance
Approved By	HiQual UK Academic and Standards Committee
Review Cycle	Annual, or earlier where legal, regulatory, safeguarding, qualification or organisational changes require review
Classification	Public Policy
Applies To	HiQual UK Personnel, Workers, Contractors, Consultants, Approved Centres, Assessors, IQAs, Tutors, Learners and Relevant Stakeholders

A protected and confidential route for raising genuine concerns about wrongdoing in the public interest

1. Purpose

HiQual UK is committed to honesty, integrity, accountability, qualification integrity and public confidence. This policy provides a safe, clear and confidential route for raising genuine concerns about serious wrongdoing and explains how HiQual UK will receive, assess, investigate and respond to such concerns. GOV.UK guidance recommends clear procedures, confidentiality, anonymous options, training and protection from victimisation.

2. Scope

This policy applies to workers and other individuals raising concerns connected with HiQual UK activities, including employees, contractors, consultants, agency personnel, Approved Centres, assessors, IQAs, tutors and relevant stakeholders. Statutory protection depends on the person's circumstances and applicable law.

3. Legal and Regulatory Framework

This policy is informed by the Employment Rights Act 1996, as amended, including statutory protections for qualifying protected disclosures, and applicable UK guidance. In Great Britain, qualifying whistleblowers may be protected from detriment and dismissal.

4. What is Whistleblowing?

Whistleblowing is reporting information about suspected wrongdoing where the concern is in the public interest. Personal grievances normally belong under grievance or complaints procedures unless they also have a public-interest dimension.

5. Matters that May be Reported

Concerns may include criminal offences, fraud or corruption; failure to comply with a legal or regulatory obligation; miscarriage of justice; danger to health or safety; serious environmental damage; serious safeguarding concerns; serious misconduct affecting learners; deliberate concealment of wrongdoing; manipulation or falsification of qualification, assessment or certification records; serious malpractice or maladministration; serious data protection breaches with a wider public-interest dimension; bribery or serious conflicts of interest; regulatory non-compliance; and qualifying sexual harassment disclosures.

6. Matters Normally Not Covered

Ordinary employment grievances, interpersonal disputes or dissatisfaction with an individual management decision will normally be handled through the relevant grievance or complaints process. Personal data complaints normally follow the privacy or complaints route unless they raise a wider public-interest concern.

7. Who Can Raise a Concern?

HiQual UK encourages any person within scope to raise a genuine concern. A person does not need certainty that wrongdoing has occurred. Workers may have statutory protection where legal requirements for a protected disclosure are met.

8. Core Principles

Concerns will be handled fairly, objectively, proportionately and confidentially. HiQual UK will take reasonable steps to protect a whistleblower's identity and will not tolerate retaliation, harassment, bullying, dismissal or detrimental treatment for raising a genuine concern.

9. Good Faith and Reasonable Belief

Concerns should be raised honestly and, where applicable, on a reasonable belief that the information tends to show wrongdoing. A concern will not be treated as misconduct merely because it is not substantiated. Knowingly false, malicious or deliberately misleading allegations may be addressed under relevant procedures.

10. How to Raise a Concern

Concerns should normally be raised in writing or verbally with the Head of Quality Assurance, a designated Whistleblowing Officer, or another senior person designated by HiQual UK. If the concern involves the normal reporting person, it should be raised with the next appropriate senior authority, such as the Chair of the Academic and Standards Committee or another independent governance representative.

11. Information to Provide

Where reasonably available, provide what happened, when and where it happened, who was involved, why it is a concern, any immediate risk and any evidence already held. A whistleblower does not need to prove the concern before raising it.

12. Anonymous Disclosures

HiQual UK may accept anonymous disclosures where enough information is available to assess them. Anonymous reporting may make investigation more difficult and limit clarification or feedback.

13. Initial Assessment

HiQual UK will assess whether the concern falls under this policy, whether immediate protective action is required, and whether another procedure or external authority is more appropriate. Factors include seriousness, public interest, urgency, credibility, conflicts of interest, safeguarding and regulatory implications.

14. Immediate Risk and Safeguarding

Where a concern indicates an immediate risk to life, health, safety, learners, vulnerable persons, qualification integrity or evidence, HiQual UK may take urgent protective measures and, where appropriate, refer the matter to emergency services, safeguarding authorities, law enforcement, regulators or other competent bodies.

15. Investigation

Investigations will be proportionate to seriousness and complexity. Investigators must be appropriately independent and declare conflicts. Investigation may include document review, interviews, record analysis and specialist advice. Persons subject to allegations will receive a fair opportunity to respond where appropriate, subject to confidentiality, safeguarding and legal considerations.

16. External Reporting

A whistleblower may in some circumstances make a protected disclosure to a prescribed person or other external body. HiQual UK will not improperly prevent or discourage a lawful protected disclosure. GOV.UK provides current guidance on prescribed persons.

17. Regulatory and Qualification Integrity

Where concerns relate to regulated qualifications, assessment integrity, certification, centre compliance or other matters within a regulator's remit, HiQual UK will consider whether notification or referral is required and will cooperate with lawful regulatory investigations.

18. Feedback

Where contact details are provided, HiQual UK will normally acknowledge receipt and, where appropriate, provide reasonable progress or outcome information. Feedback may be limited by confidentiality, personal data, legal privilege, ongoing investigations or rights of others.

19. Target Timeframes

HiQual UK will aim to acknowledge a concern within 5 working days where contact details are available and normally complete an initial assessment within 10 working days. Investigations will proceed as promptly as reasonably practicable, with progress updates where appropriate. These are internal targets, not legal deadlines.

20. Records and Data Protection

Whistleblowing records will be handled under the HiQual UK Data Protection & UK GDPR Policy. Access will be limited to those with a legitimate need. Records will be retained only as necessary and in accordance with retention requirements.

21. Protection from Victimisation

Any suspected retaliation because a person raised a genuine concern, assisted an investigation or made a protected disclosure will be treated seriously and may result in disciplinary, contractual or other corrective action.

22. Malicious or Deliberately False Reports

A genuine concern that later proves unfounded is not, by itself, misconduct. Deliberately fabricated, malicious or knowingly false allegations may be addressed under relevant procedures, but this provision must not discourage genuine reporting.

23. Conflicts of Interest

Anyone receiving, assessing or investigating a concern must declare actual, potential or perceived conflicts. Where a conflict exists, the matter will be transferred to an appropriately independent person or governance body.

24. Governance and Oversight

The Board has overall responsibility for the whistleblowing framework. The Academic and Standards Committee oversees concerns affecting academic standards, qualification integrity, assessment, certification or Approved Centres. The Head of Quality Assurance coordinates operational handling unless conflicted.

25. Training and Awareness

Relevant personnel will receive appropriate awareness and training on whistleblowing, confidentiality, non-retaliation, conflicts, investigation principles and escalation. Approved Centres and relevant partners will be informed of appropriate reporting routes.

26. Monitoring and Review

HiQual UK will monitor the operation of this policy, including the number and nature of concerns, response times, outcomes, recurring themes and actions taken, without compromising confidentiality. Lessons learned will inform governance, quality assurance and risk management.

27. Policy Exceptions

Any exception must be justified, documented and approved by the appropriate authority. No exception may suppress a lawful protected disclosure, expose a whistleblower to retaliation or conceal serious wrongdoing.

28. Related Policies and Procedures

This policy should be read alongside: Academic Governance Policy; Quality Assurance Policy; Malpractice and Maladministration Policy; Complaints Policy; Grievance Policy; Disciplinary Policy; Equality, Diversity & Inclusion Policy; Data Protection & UK GDPR Policy; Safeguarding Policy; Conflicts of Interest Policy; Risk Management Policy; Records Management and Retention Policy; Fraud and Anti-Bribery Policy; Centre Monitoring Policy.

29. Document Control

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30. Version Control

Version	Date	Description of Change	Author	Approval
1.0	1 June 2026	Initial publication of HiQual UK Whistleblowing Policy	Sarah Williams, Head of Quality Assurance	Academic and Standards Committee

31. Policy Statement

HiQual UK encourages individuals to raise genuine concerns about serious wrongdoing in the public interest. The organisation will provide an appropriate, confidential and fair process for receiving, assessing and investigating concerns.

HiQual UK will take reasonable steps to protect whistleblowers from retaliation and will handle personal information in accordance with applicable data protection requirements. Serious concerns affecting learners, qualification integrity, assessment, certification, safeguarding, legal compliance or public confidence will be escalated appropriately.

END OF POLICY