

# ITALIA CONTI

## Whistleblowing Policy and Procedures

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This policy will be reviewed and approved by the Policy Steering Group annually. [06]

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## 1. Overview

Italia Conti is committed to fostering a culture of openness and accountability, aiming to reduce the risk of misconduct or the inadvertent or deliberate concealment of illegal or unethical behaviour. We conduct our business with honesty and integrity and expect staff to respond appropriately should these standards ever be compromised.

“Whistleblowing” concerns the reporting of by staff of wrongdoing at work which is “in the public interest”<sup>1</sup>. Italia Conti has implemented this *Whistleblowing Policy* to meet its obligations under the Public Interest Disclosure Act 1988 (PIDA).

The whistleblowing process is governed by PIDA. Wherever possible, whistleblowing reports should be directed to designated contacts **within** the organisation. Although most issues raised by whistleblowing can be resolved internally, this policy also considers the process by which such concerns can be reported externally.

This *Whistleblowing Policy* is reviewed annually.

## 2. Aims:

This policy aims to:

- demonstrate that Italia Conti does not tolerate malpractice;
- encourage prompt reporting of suspected wrongdoing, assuring concerns will be taken seriously, investigated, and treated confidentially where possible;
- inform staff how to raise concerns;
- provide a clear, accessible procedure for reporting, including options outside normal line management;
- explain how Italia Conti will respond to concerns;
- make staff aware of the protections available when raising a whistleblowing concern;
- assure staff they will not suffer detriment for raising a legitimate concern, even if mistaken (**except** where concerns are false or malicious).

## 3. Who this policy applies to

The policy applies to all employees or other workers who provide services to Italia Conti in any capacity, including self-employed consultants or contractors who provide services on a personal basis and agency workers.

In addition, Italia Conti will accept and consider concerns raised by students, applicants and other members of the Italia Conti community where the concern is about suspected wrongdoing, misconduct, unethical behaviour, regulatory breach, serious risk to students or the public, or concealment of such matters. Student concerns about individual service, academic or personal matters will normally be handled under the relevant student complaints, appeals, safeguarding or disciplinary process unless they disclose a wider public-interest or regulatory concern.

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<sup>1</sup> GOV.UK, *Whistleblowing for employees: What is a whistleblower*, available at: <https://www.gov.uk/whistleblowing> (accessed November 2025).

This *Whistleblowing Policy* does not form part of the employee's contract of employment and may be amended at any time.

## 4. Whistleblowing principles

The process itself involves an individual (a "whistleblower") disclosing genuine concerns about possible malpractice or wrongdoing to either a specified **internal** contact at Italia Conti, or a prescribed **external** person or organisation identified by the UK Government for that purpose<sup>2</sup>.

## 5. Whistleblowing Policy (general exemptions)

The *Whistleblowing Policy* is **not a substitute** for our normal line management processes; staff should always consider using these avenues first when raising concerns.

The *Whistleblowing Policy* **should not be used to report grievances under a contract of employment**<sup>3</sup>: staff should use the Grievance Procedure outlined in Section 10 of the *Italia Conti Staff Handbook*. This normally includes personal staff grievances such as bullying or harassment.

Safeguarding concerns **should normally** be dealt with under our *Safeguarding and Child Protection Policy* which is available at <https://www.italiaconti.com/about-us/policies> .

If you are uncertain whether something is within the scope of this *Whistleblowing Policy*, you should seek advice in confidence from the Director of Human Resources.

## 6. Definitions:

**Whistleblower:** a person who reports malpractice/wrongdoing which is "in the public interest".

A "Whistleblower" can be a staff member, a volunteer, a self-employed consultant, contractor or other worker who provide services to Italia Conti and who has a genuine concern about suspected malpractice.

**Malpractice or Wrongdoing:** acts usually illegal, negligent or wrong behaviour. Examples could involve one (or more) of the following<sup>4</sup>:

- child protection and/or safeguarding concerns;
- criminal offences, e.g., bribery, corruption or fraud;
- the encouragement of radicalisation and extremism;
- financial fraud or mismanagement;

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<sup>2</sup> <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies>

<sup>3</sup> The *Whistleblowing Policy* **must not** be used in respect of grievances under contract of employments, i.e. a formal complaint alleging a violation, misinterpretation, or misapplication of a specific term or provision of a contract.

<sup>4</sup> This list is not exhaustive.

- deliberate actions or omissions which contravene Italia Conti's Staff Code of conduct (including those that could, in extreme cases, lead to a miscarriage of justice), or which might lead to a serious risk to health and safety or to the environment;
- a failure to comply with legal or professional obligations, or regulatory requirements;
- suspected fraud, financial irregularity, inappropriate use of public funds, or inaccurate data or information submitted for the purpose of accessing public funds;
- serious or systemic risk to students' interests, student protection, safeguarding, academic quality or standards, access and participation obligations, freedom of speech or academic freedom;
- negligence;
- unauthorised disclosure of confidential information;
- a breach of Italia Conti's internal policies and procedures;
- conduct likely to damage Italia Conti's reputation;
- deliberate concealment of any of the aforementioned acts.

These acts can be in the past, present or future. For example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen.

**Disclosure:** the act of providing information about suspected malpractice or wrongdoing.

## 7. Reporting a disclosure

### Whom to contact:

In most cases the Whistleblower will be able to raise any concerns with their line manager. The Whistleblower may tell them in person, although it is usually preferable for concerns to be made in writing wherever possible. The line manager may be able to agree a way of resolving the concern quickly and effectively. In some cases, they may refer the matter to the CEO, or an appropriate member of the Senior Leadership Team (SLT).

If the concern is about the Whistleblower's line manager, then the matter should be reported to the next senior manager in the organisational hierarchy. (If a Whistleblower is unsure whom that is, they should contact Human Resources for clarification).

One mechanism for reporting concerns is the [speakup@italiaconti.co.uk](mailto:speakup@italiaconti.co.uk) email address. Access to the speakup mailbox must be restricted to nominated role-holders approved by the CEO and Chair of the Board. Where a concern involves, or may reasonably be perceived to involve, a mailbox recipient or any person with mailbox access, that person must not access, triage, investigate, decide or receive confidential details of the concern beyond what is necessary.

Where the concern involves a member of SLT other than the CEO or Principal, the matter must normally be routed to the CEO unless the CEO is implicated or conflicted.

Where the concern involves the CEO, the matter must be routed to the Chair of the Board.

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Where the concern involves the Principal, or raises a concern about the integrity, independence or accuracy of academic assurance reporting to the Board, the matter must be routed to the Chair of the Board or another Independent Director nominated by the Chair.

Where the concern relates to academic governance, academic assurance, academic standards, academic quality or the student academic experience, but does not involve the Principal and does not compromise the independence of AQB reporting to the Board, the matter should be routed to the Principal and/or AQB as appropriate. The CEO may also be informed or involved where the matter has operational, financial, regulatory, safeguarding, public funding, data, reportable event or implementation implications, provided this does not compromise confidentiality, independence or conflict management.

Material concerns must be escalated to the Board of Directors, Audit and Risk Committee and/or AQB in accordance with their respective remits and the applicable escalation thresholds.

Where a disclosure raises a material compliance, financial, safeguarding, data, regulatory, reputational, public funding or governance risk, the matter must be escalated for classification under Italia Conti's approved serious incident, escalation and regulator notification arrangements, including the OfS Notifications and Reportable Events Procedure where applicable. Where the CEO is not implicated or conflicted, the CEO is responsible for institutional classification, external reporting consideration and OfS notification consideration. Where the CEO or Principal is implicated or conflicted, escalation must be to the Chair of the Board. This classification route does not displace the Principal/AQB academic assurance route, does not permit the CEO to approve, amend, withhold or filter AQB reporting to the Board, and does not override the conflict-management routes in this policy. The Board of Directors, Audit and Risk Committee and/or AQB must receive reporting required by their respective remits and the approved escalation thresholds, while maintaining appropriate confidentiality.

Subject to the routing and conflict-management provisions above, where the matter is more serious, or the Whistleblower feels that their line manager or member of the SLT has not addressed their concern, or if the Whistleblower prefers not to raise it with them for any reason, they may raise the whistleblowing concern with the CEO. Where the concern involves the CEO or Principal, raises a concern about the integrity, independence or accuracy of academic assurance reporting to the Board, or the Whistleblower feels unable to approach the CEO, the Chair of the Board of Directors should be the first point of contact. The CEO or Chair of the Board of Directors, upon receiving the concern, may delegate the investigation to an appropriate non-conflicted person, provided that delegation is consistent with this Section 7 and Section 8.

Any concern raised will be investigated thoroughly and in a timely manner and, where appropriate, corrective action will be taken. The Whistleblower will be kept informed of the progress of the investigation and its likely timescale. Wherever possible and subject to third party rights, the Whistleblower will be informed of the resolution.

There are separate procedures if the concern is about the CEO or Principal, (see **Section 11**), or a member of the Board of Directors (see **Section 12**).

If Whistleblowers feel unable to raise an issue with Italia Conti or feel that their genuine concerns are not being addressed, they may report their concerns to prescribed people and bodies. This list is available on the UK Government website at: <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies> .

## Information to include:

Whenever possible, the whistleblowing disclosure should be made in writing. The whistleblowing disclosure should include:

- a) the names of those allegedly committing the wrongdoing;
- b) relevant dates;
- c) relevant locations;
- d) context;
- e) any other relevant evidence;
- f) any personal interest the staff member might have in the matter.

## **8. Investigating the disclosure**

When a Whistleblowing disclosure is made to the appropriate staff member at Italia Conti (see **Section 7**), this member of staff receiving the disclosure (referred to here as the “recipient”), will follow this procedure:

- i. meet with the person bringing the disclosure (the “whistleblower”) within a reasonable time<sup>5</sup>. The Whistleblower may be joined by a companion, (a colleague or a trade union or professional association representative). Note: The whistleblower’s companion must respect the confidentiality of the disclosure and any subsequent investigation.
- ii. obtain as much detail as possible about the disclosure at this meeting and record the information, e.g., parties involved, dates, places and as much evidence and context as possible. Whistleblowers (and staff dealing with whistleblowing cases) should also include details of any personal interest in the matter. If it becomes apparent the disclosure is not of a whistleblowing nature, the recipient should handle the concern in line with the appropriate policy/procedure.
- iii. reiterate, at this meeting, that the whistleblower is protected from any unfair treatment or risk of dismissal as a result of bringing the disclosure. They should be advised, however, that if the disclosure is found to be malicious or vexatious, disciplinary action may be taken (see **Section 14** of this policy).
- iv. The whistleblower should be advised that may be required to attend additional meetings to provide further information as the disclosure raised is investigated.

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<sup>5</sup> The recommended time would be within 14 working days.

- v. The recipient should establish, (taking reasonable steps and asking advice from appropriate and authorised others) whether there is sufficient cause for concern to warrant further investigation.

**If there is:**

- vi. the recipient should then arrange a further investigation into the matter in accordance with the routing and conflict-management provisions in Section 7, involving the Principal, CEO or member of the SLT only where appropriate and non-conflicted. In some cases, they may need to bring in an external, independent body to investigate. In other cases, they may need to report the matter to the police.
- vii. the person who raised the concern should be informed of how the matter is being investigated and an estimated timeframe for when they will be informed of the next steps.
- viii. the disclosure will be investigated by an investigator or panel appointed in accordance with the routing in Section 7. The investigator or panel must have appropriate independence, seniority and subject-matter expertise. The CEO may appoint or participate in the investigation only where this is consistent with Section 7 and the CEO is not implicated or conflicted. Where the concern involves the Principal, or raises a concern about the integrity, independence or accuracy of academic assurance reporting to the Board, the Chair of the Board or nominated Independent Director must appoint or approve the investigator or panel. Italia Conti may appoint an external independent investigator where appropriate.
- ix. The investigator or panel must be independent of the matter being investigated and must include appropriate expertise for the subject matter. Any person named in, implicated in, or conflicted by a disclosure must not decide whether the disclosure is investigated, sit on the investigation panel, receive confidential details beyond what is necessary, or approve the outcome.
- x. any disclosure raised will be investigated thoroughly and in a timely manner, and appropriate action will be taken. The whistleblower will be kept informed of the investigation's progress and, whenever possible (and subject to third party rights), informed of the outcome. Please bear in mind that the need for confidentiality may sometimes prevent Italia Conti giving the whistleblower specific details of the investigation or any disciplinary action taken as a result. The whistleblower and any other staff members involved in the investigation should treat any information as confidential.

Any material disclosure must also be escalated, classified and reported in accordance with the routing in Section 7. The investigation route must not override the CEO, Principal, AQB, Chair, Independent Director or conflict-management routes set out in Section 7.

If the whistleblower is not satisfied that their concern is being properly dealt with, they have a right to raise it in confidence with the Board of Directors<sup>6</sup>.

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<sup>6</sup> It is recommended that this is done in a written form, e.g. email or letter.

## 9. Outcome of the Investigation

Once the investigation – whether an initial investigation of the disclosure, or a full investigation– is complete, the investigating person(s) will prepare a **report** detailing the findings and confirming whether or not any wrongdoing has occurred. The report will include any recommendations and details on how the matter can be rectified and whether or not a referral is required to an external organisation, such as the local authority or police.

The investigating person(s) must maintain a confidential case record, including the disclosure, triage decision, investigator or panel membership, conflict checks, investigation steps, outcome, referrals, corrective actions, action owners, deadlines and closure evidence. Recommendations must be tracked to completion and escalated if overdue or if they indicate a continuing material risk.

They will inform the person who brought the disclosure of the outcome of the investigation, though certain details may need to be restricted due to confidentiality, e.g., it may not be possible to provide specific details of the investigation, or any disciplinary action taken as a result. The Whistleblower should treat any information about the investigation as confidential.

Beyond the immediate actions, the Principal, CEO, Directors and other staff, if necessary, will review the relevant policies and procedures to prevent future occurrences of the same wrongdoing.

Whilst Italia Conti cannot always guarantee the outcome sought in any Whistleblowing allegation, we will try to deal with disclosures fairly and in an appropriate way.

An anonymised summary of whistleblowing cases, themes, actions, lessons learned and any open recommendations must be reported periodically to the Audit and Risk Committee and, where material, to the Board of Directors, in line with confidentiality and data protection requirements.

## 10. Confidentiality

The Employment Rights Act 1996 provides protection for workers who ‘blow the whistle’ where they reasonably believe that some form of illegality, injustice or breach of health and safety has occurred or is likely to occur. The disclosure has to be “in the public interest”. Italia Conti encourages staff with appropriate concerns to use the *Whistleblowing Procedure*.

Italia Conti hope that staff will feel able to voice whistleblowing concerns openly under this procedure. However, if staff wish to raise a matter confidentially, we will make every effort to keep their identity secret. If it is necessary for anyone investigating the concern to know the Whistleblower’s identity, this will be discussed with the Whistleblower.

If there is a basis for suspecting criminal activity, then the Police will always be informed.

We do not encourage staff to make disclosures anonymously: a proper investigation may not be possible if we cannot obtain further information from the Whistleblower. Anonymous disclosures also make it more difficult to establish whether the allegations are credible. Whistleblowers who are concerned about maintaining their confidentiality should discuss this with the Director of Human Resources who can advise on the appropriate steps. If staff are

still unsure about making a disclosure, they can seek advice from Protect<sup>7</sup>, the independent whistleblowing charity.

## **11. Whistleblowing concerns about the CEO or Principal**

If the whistleblowing concern is about the CEO or Principal, or it is believed they may be involved in the wrongdoing in some way, the staff member should report their concern to the Chair of the Board of Directors. Details of the current Chair of Directors can also be found at: <https://www.italiaconti.com/about-us/board-of-directors-and-advisory-board>

## **12. Concerns against members of the Board of Directors**

If the concern is against a member of the Board of Directors, the matter must be referred to the Chair of the Board unless the Chair is implicated or conflicted. If the concern is against the Chair, or where the Chair is otherwise implicated or conflicted, the matter must be referred to another Independent Director who is not involved in the concern, or to an external independent investigator appointed by non-conflicted members of the Board of Directors. The CEO, Principal or any person implicated in the concern must not decide the handling of that concern. Any external notification must be determined by reference to the OfS Notifications and Reportable Events Procedure and any other applicable statutory or regulatory reporting route.

## **13. External Procedures**

The aim of this Policy is to provide an internal mechanism for reporting, investigating, and remedying any malpractice concerns in the workplace. In most cases, staff should not find it necessary to alert anyone outside of our organisation.

Where all internal procedures have been exhausted, a member of staff shall have a right of access to an external person/body, such as a regulator. This may include (depending on the subject matter of the disclosure) HMRC, the Audit Commission, the Health and Safety Executive and/or the Local Authority Designated Officer (where the disclosure relates to a child protection issue). Further help in finding a list of prescribed regulators (and the topic areas they cover), can be found at Protect.

It will very rarely, if ever, be appropriate for the media to be alerted.

It should be noted that under the Public Interest Disclosure Act 1998, there are circumstances where a member of staff may be entitled to raise a concern directly with an external body where the individual *reasonably* believes:

- that exceptionally serious circumstances justify it;
- that Italia Conti would conceal or destroy the relevant evidence;
- where they believe they would be victimised by Italia Conti, or
- where the Secretary of State has ordered it.

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<sup>7</sup> Protect – the UK Whistleblowing Charity: advice line: 020 3117 2520 (Option 1); Advice Line: [whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk); Website: <https://protect-advice.org.uk>.

If the concern is about radicalisation and/or extremist activity then, under Italia Conti's Prevent Duty<sup>8</sup>, it should be reported to the appropriate agencies.

We strongly encourage Whistleblowers to seek advice before reporting a concern to anyone external. In addition to a confidential helpline, Protect also has a list of prescribed regulators for reporting certain types of concern.

#### **14. Prevent & Child Protection Contacts**

Staff should contact the well-being team at their site for these details. The current designated Safeguarding Lead is Catherine Cooper, (01483) 322220 ext. 248.

#### **15. Malicious or vexatious accusations**

Staff are encouraged to raise concerns when they believe there to potentially be an issue. If an allegation is made in good faith, but the investigation finds no wrongdoing, there will be no disciplinary action against the member of staff who raised the concern.

If, however, an allegation is shown to be deliberately invented, vexatious, frivolous or malicious, Italia Conti will consider whether any disciplinary action is appropriate against the person making the allegation.

#### **16. Protection from Reprisal or Victimisation**

No member of staff will suffer a detriment or be disciplined for raising a genuine and legitimate concern, providing that they do so in good faith and follow the *Whistleblowing Policy and Procedure*.

It is understandable that 'Whistleblowers' are sometimes worried about possible repercussions. Italia Conti aims to encourage openness and will support staff members who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Detrimental treatment would include dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If a member of staff believes that they have suffered any such treatment, they should report this immediately to a non-conflicted member of the SLT, the CEO, the Director of Human Resources, the Chair of the Board of Directors, or another route identified in Section 7, as appropriate to the concern and any conflict of interest. If the matter is not remedied, the member of staff should raise it formally using the Italia Conti's established procedure for dealing with staff grievances.

Staff must not threaten or retaliate against 'Whistleblowers' in any way. Anyone involved in such conduct will be subject to disciplinary action.

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<sup>8</sup> Staff should contact the Safeguarding & Wellbeing Team about Prevent & Child Protection contacts.

## **17. Safeguarding**

If a member of staff suspects that there is a serious safeguarding issue that they feel that their Line Manager or member of the Senior Leadership Team is not taking seriously, they should in the first instance contact the Designated Safeguarding Lead:

Catherine Cooper (01483) 322220 ext. 248; or via [safeguarding@italiaconti.co.uk](mailto:safeguarding@italiaconti.co.uk)

Italia Conti's *Safeguarding and Child Protection Policy* and procedure should be followed if the matter is in relation to a student under 18yrs.

## **18. Privileged documents**

There is an exception to disclosure of documents in respect of those which are classed as "privileged" for whistleblowing. That means, that part of a document can be redacted if the information is commercially sensitive, confidential, and/or potentially irrelevant.

## **19. Further Guidance**

Further official advice about whistleblowing can be found at [Whistleblowing for employees: What is a whistleblower - GOV.UK](#)

## **20. Linked policies**

*Complaints Policy and Procedures*  
*Health & Safety Policy*  
*ICAS Whistleblowing Policy*  
*Prevent Risk Assessment*  
*Safeguarding and Child Protection Policy*  
*Safeguarding Prevent Duty*  
*Anti-Radicalisation and Extremism Policy*  
*Anti-Fraud Policy*  
*Anti-Corruption and Bribery Policy*  
*Conflict of Interest Policy*  
*Risk Management Framework*  
*OfS Notifications and Reportable Events Procedure*  
*Data Protection and information governance policies*  
*Student Protection Arrangements*  
*Freedom of Speech Policy*  
*Academic Freedom Policy*

## Appendix 1: Key Points

### Don't think what if I'm wrong – think what if I'm right?

#### Reasons for whistleblowing:

- Everyone has a responsibility for raising concerns about unacceptable practice or behaviour.
- To prevent the problem worsening or widening.
- To protect or reduce risks to others.
- To prevent becoming implicated yourself.

#### What stops people from whistleblowing:

- Starting a chain of events which spirals.
- Disrupting the work or project.
- Fear of getting it wrong.
- Fear of repercussions or damaging careers.
- Fear of not being believed.

#### How to raise a concern:

At Italia Conti we believe in open and honest communication. If any students have concerns about their experience with us, we do urge them to speak to their Head Tutor, Course Leader, Head of Year or a Vice Principal as appropriate. If staff have a concern, we encourage them to speak to a line manager in the first instance, a member of the Senior Management or Senior Leadership teams or HR.

For areas of particular concern, the e-mail address: [speakup@italiaconti.co.uk](mailto:speakup@italiaconti.co.uk) is managed through restricted access arrangements under this policy.

Alternatively, Italia Conti's Board of Directors is chaired by an Independent Non-Executive Director Keith Bailey ([keith.bailey@italiaconti.co.uk](mailto:keith.bailey@italiaconti.co.uk)). Staff or students are welcome to contact Keith, should they wish.

You should voice your concerns, suspicions, or uneasiness as soon as you feel you can. The earlier a concern is expressed the easier and sooner action can be taken. Try to pinpoint exactly what practice is concerning you and why.

## Appendix 2: Email Advisory Note

Official email communications from Italia Conti may include this note below the signature for selected members of staff.

“For areas of particular concern, we have a Whistleblowing Policy, and an e-mail address: [speakup@italiaconti.co.uk](mailto:speakup@italiaconti.co.uk) is managed through restricted access arrangements under this policy. The Whistleblowing Policy, along with our other salient policies, is available on our website: <https://www.italiaconti.com/about-us/policies/>.

Alternatively, Italia Conti has a Board of Directors which is chaired by an Independent Non-Executive Director Keith Bailey ([keith.bailey@italiaconti.co.uk](mailto:keith.bailey@italiaconti.co.uk)). Staff or students are welcome to contact Keith, should they wish.”

**END**