

Staff Whistleblowing Policy

LCCA Governance

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Section 1: Policy Statement

- 1.1 LCCA recognises its legal and ethical responsibility to provide an environment where individuals can report genuine concerns safely and with confidence. LCCA will:
 - 1.1.1 Treat all disclosures seriously and investigate them appropriately;
 - 1.1.2 Protect whistleblowers from detriment, victimisation, or dismissal;
 - 1.1.3 Ensure confidentiality is maintained as far as reasonably possible;
 - 1.1.4 Take disciplinary action against anyone who seeks to prevent, deter, or retaliate against a whistleblower.
- 1.2 This policy is underpinned by:
 - 1.2.1 The Public Interest Disclosure Act 1998
 - 1.2.2 The Enterprise and Regulatory Reform Act 2013
 - 1.2.3 The Committee of University Chairs (CUC) Guide for Members of Higher Education Governing Bodies in the UK
 - 1.2.4 The Whistleblowing Commission Code of Practice (2014)

Section 2: Scope

- 2.1 This policy applies to:
 - 2.1.1 All employees of LCCA (permanent, temporary, or fixed-term);
 - 2.1.2 Visiting tutors and contractors;
 - 2.1.3 Volunteers;
 - 2.1.4 Any other individual engaged in work or partnership with LCCA.
- 2.2 The Student Whistleblowing Policy applies to students.
- 2.3 This policy should be used where an individual reasonably believes that a concern is in the *public interest*, for example involving (the following is a non-exhaustive list):
 - 2.3.1 Criminal offences or illegal acts;
 - 2.3.2 Breaches of legal obligations;
 - 2.3.3 Miscarriages of justice;
 - 2.3.4 Endangerment of health and safety;
 - 2.3.5 Damage to the environment;
 - 2.3.6 Deliberate concealment of any of the above.
- 2.4 Concerns relating to personal grievances (e.g. bullying, discrimination, or harassment) should normally be raised under the appropriate HR or student complaints policies rather than through this procedure.
- 2.5 If a concern has been raised which is of a personal nature but which may be of interest to the public, the HR Director will consider and discuss with you which is the most appropriate policy to raise the concern under and process to take.

Section 3: About this Policy

- 3.1 The purpose of this policy is to provide a clear and confidential mechanism through which staff, tutors, volunteers, or contractors of the London College of Contemporary Arts.
- 3.2 **LCCA staff** can raise genuine concerns about suspected wrongdoing, malpractice, or the mismanagement of public interest matters within LCCA.
- 3.3 LCCA is committed to the highest standards of openness, integrity, and accountability. This policy ensures that individuals can raise concerns without fear of reprisal, and that such concerns are investigated promptly and fairly.

Section 4: Definitions

Whistleblowing: The disclosure of information by an individual who reasonably believes that wrongdoing has occurred, is occurring, or is likely to occur, and that the disclosure is in the public interest.

Whistleblower: A person who raises a concern under this policy.

Public Interest: Issues that affect others beyond the individual personally, such as the integrity, governance, or safety of the institution or its community.

Section 5: Governance

- 5.1 The Senior Management Team will review all whistleblowing reports annually to ensure appropriate action has been taken and that lessons are learned.
- 5.2 This policy will be reviewed every two years, or sooner if required by changes in legislation or best practice.

Role	Responsibilities
All Staff	To act with integrity and raise concerns where wrongdoing is suspected.
Line Managers and Tutors	To listen to concerns, treat them seriously, and escalate appropriately.
Head of Operations	To ensure concerns are handled fairly, independently, and without conflict of interest.
Senior Management Team	To oversee investigations, ensure compliance, and monitor outcomes.
Director of Quality & Governance	To maintain policy oversight and report annually to the Board on disclosures and outcomes.

Section 6: Procedure

6.1 Raising a Concern

Concerns should normally be raised promptly and through existing channels, such as:

- 6.1.1 The individual's line manager; or
- 6.1.2 If inappropriate, the Head of Operations or Deputy Managing Director

Before raising a concern, individuals may seek confidential advice from Protect (formerly Public Concern at Work) via . For the avoidance of doubt, this is an external service which is independent of LCCA and LCCA is not aware of concerns raised with Protect. LCCA does not accept any responsibility or liability for any advice provided by Protect.

Concerns may be raised verbally or in writing (written concerns are preferred) and should include:

- 6.1.3 The background and nature of the concern
- 6.1.4 Relevant dates, locations, and people involved
- 6.1.5 Any supporting evidence

If concerns are raised verbally, a written summary of the concern will usually be taken during the meeting to enable LCCA to investigate the concern appropriately.

Anonymous disclosures will be considered but may limit the ability to investigate thoroughly. Individuals are therefore encouraged to provide their identity in confidence.

It should be recognised that the investigation process may, of necessity, reveal the source of the information and as part of the investigation, an individual making a disclosure may need to provide a statement. LCCA therefore cannot guarantee anonymity.

6.2 Initial Assessment

Upon receipt, the concern will be reviewed by an appropriate senior officer independent of the matter. They will determine, for example:

- 6.2.1 Whether the issue falls under this policy or another procedure (e.g. complaints, disciplinary)
- 6.2.2 Whether sufficient information exists to proceed with an investigation
- 6.2.3 Whether external referral is required (e.g. to the applicable awarding body, a governing body, or the police)
- 6.2.4 Whether no further action is required
- 6.2.5 Whether the issue can be resolved informally

The individual who has raised the concern will be updated of the outcome of this initial assessment subject to confidentiality or data protection rules.

6.3 Investigation

If an investigation proceeds:

- 6.3.1 It will be led by an independent investigator with no conflict of interest
- 6.3.2 The subject of the concern will be informed and given the opportunity to respond
- 6.3.3 Findings will be submitted to the Board of Directors for review and decision

Possible outcomes include:

- 6.3.4 No further action
- 6.3.5 Disciplinary procedures under staff or student regulations
- 6.3.6 Referral to an external authority
- 6.3.7 Recommendations for governance or process improvements

6.4 Notification and Record Keeping

Both the whistleblower and the subject of the concern will be informed of the outcome in writing, subject to confidentiality requirements.

All records will be retained securely for four years subject to data retention rules and monitored annually by the Senior Management Team to identify any patterns or systemic issues.

6.5 Re-consideration

If the whistleblower is not satisfied with the outcome either at the initial assessment or investigation conclusion stage, they may appeal to the HR Director. They must do so within 10 working days and in writing. Appeals can only be made on the following grounds:

- 6.5.1 There is evidence of significant procedural irregularity in the investigation process that would affect the decision made;
- 6.5.2 Evidence of bias; and/or
- 6.5.3 There is further evidence that was not available at the time the original disclosure was made.

Upon receipt of the appeal, the HR Director will appoint an appropriate senior member of LCCA to undertake the review. The reviewer will aim to reach a decision within 20 working days of their appointment, which will be the final decision of LCCA.

Section 7: Confidentiality and Protection

- 7.1 LCCA will make every effort to protect the identity of individuals who raise concerns in good faith.
- 7.2 We will make all reasonable efforts to protect individuals who raise a disclosure under this policy and to ensure that no detriment, dismissal or victimisation occurs as a result.
- 7.3 Deliberately false or malicious allegations will, however, be treated as a disciplinary matter.

- 7.4 Managers or staff who attempt to discourage or retaliate against whistleblowers will also be subject to disciplinary action.

Section 8: Accessibility and Alternative Formats

- 8.1 If you need this policy in a different format, contact quality@lcca.ac.uk. We can normally provide large print / an accessible Word version / other agreed formats and will discuss anything else you need.

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