

Student Whistleblowing Policy

LCCA Governance

Contents

Section 1: Purpose and scope of this policy	2
Section 2: When to use this policy	2
Section 3: Malpractice covered by this policy	3
Section 4: Procedure for raising a concern	3
Section 5: Responding to concerns raised	4
Section 6: If you are not satisfied	4
Section 7: Confidentiality	4
Section 8: Raising your concern externally (exceptional cases)	5
Section 9: Protection and support for those raising concerns	5
Section 10: Accessibility and Alternative Formats	6

Section 1: Purpose and scope of this policy

- 1.1 All organisations face the risk of things going wrong or of unknowingly being involved in or subject to malpractice.
- 1.2 LCCA (**we/our/us**) takes malpractice very seriously. We are committed to conducting our business with honesty, integrity, openness and accountability, and we expect our community, as a whole, to maintain these high standards, in accordance with our policies and procedures. This policy applies to all students (**you/your**) within our institution who we encourage to speak up about any behaviours that give you cause for concern. We want everyone to feel secure about raising such concerns.
- 1.3 The aims of this policy are:
 - a) to give students the opportunity and guidance to confidentially report concerns about suspected wrongdoing that affects LCCA (and/or other people where there is a public interest) as soon as possible, in the knowledge that concerns will be taken seriously and investigated appropriately, and that their confidentiality will be respected;
 - b) to provide students with guidance as to how to raise those concerns; and
 - c) to reassure students that they should be able to raise genuine concerns without fear of any repercussions including any detriment to their studies, results or qualifications obtained, even if they turn out to be mistaken.
- 1.4 It does not matter if a student who raises a concern is mistaken about it – you do not have to prove anything about the allegation that you are making but you must reasonably believe that the disclosure is made in the interests of the institution and its community and that the information you have tends to show some malpractice.
- 1.5 This policy is non-contractual and we may amend it at any time.

Section 2: When to use this policy

- 2.1 There is a difference between whistleblowing and raising a complaint:
 - a) whistleblowing is where you have a concern about a danger or illegality that has a public interest aspect to it, for example because it threatens other students, third parties or the public generally; whereas
 - b) a complaint will typically relate to your personal educational circumstances or interactions with LCCA.
- 2.2 This policy does not set out the procedure that applies to general or personal complaints about LCCA. If you have a complaint about your own personal circumstances, such as any aspect of student life or an academic appeal, then you should use LCCA's Student Complaints Policy or academic appeals policies instead.
- 2.3 This policy may not be used to re-open or review a matter already decided in connection with LCCA's other policies and procedures or to question or reconsider any financial or business decisions.

- 2.4 We have separate Anti-Corruption & Bribery and Fraud Risk Management policies. You should refer to those policies for reporting concerns about such issues instead of the process set out here.

Section 3: Malpractice covered by this policy

- 3.1 Whistleblowing is the reporting of suspected malpractice, wrongdoing or dangers in relation to an institution's activities.
- 3.2 The kinds of malpractice covered by this policy include:
- a) criminal offences (however, in relation to bribery and corruption and fraud, please refer to the reporting requirements set out in LCCA's Anti-Bribery and Corruption Policy or Fraud Risk Management Policy, as applicable);
 - b) improper behaviours such as bullying or harassment;
 - c) breach of any legal, regulatory or professional obligation;
 - d) conduct likely to damage LCCA's reputation or financial wellbeing;
 - e) danger to the health and safety of any individual;
 - f) damage to the environment;
 - g) academic malpractice or misconduct;
 - h) deliberately concealing any of the above, or deliberately concealing information demonstrating that one or more of the above are taking place; and
 - i) any retaliation against someone for speaking up about these matters.
- 3.3 Queries relating to whistleblowing, including whether something is within the scope of this policy, should be directed to: the Executive Dean.

Section 4: Procedure for raising a concern

- 4.1 If you are concerned about any form of malpractice covered by this policy, you should normally raise the issue with your student support officer. You may tell them in person or put the matter in writing if you prefer. We would hope that they would be able to find a way to resolve your concern quickly and effectively.
- 4.2 If you feel that you cannot tell the Student Support Officer for whatever reason, you should raise the issue with your Course Director. Your Course Director may also feel that your concern should be referred to the Associate Dean, if so, they will discuss this with you before making the referral.
- 4.3 If you have raised concerns and you are still concerned, or the matter is so serious that you feel you cannot discuss it with either of the two individuals named above, you should raise the matter with: the Executive Dean.
- 4.4 Although you are not expected to prove the truth of your concern beyond doubt or provide evidence, you will generally need to provide the following information as a minimum:
- a) the nature of the concern and why you believe it to be true; and
 - b) the background and history of the concern (giving relevant dates where possible).

You may wish to consider discussing your concern with another student or a member of staff before raising it formally under this policy but remember that once you have raised a concern formally (alone or with a colleague), in the interests of everyone involved, what follows will be a confidential process.

Section 5: Responding to concerns raised

- 5.1 LCCA is committed to ensuring that all disclosures raised will be dealt with appropriately, consistently, fairly and professionally. We aim to acknowledge your report within 7 days of receipt.
- 5.2 LCCA will conduct an initial assessment to decide what action we need to take to deal with your report. This may involve simply clarifying certain matters, clearing up misunderstandings or resolving the matter without the need for investigation. We may need to arrange a meeting with you to discuss the concern raised. In such circumstances, you may bring another student, a member of staff or other appropriate representative to any meeting that takes place, provided that the companion respects the confidentiality of the disclosure and any subsequent investigation. LCCA may ask you for further information about the concern raised, either at this meeting or at a later stage.
- 5.3 After its initial assessment, LCCA will decide how to respond. Usually this will involve making internal enquiries first, but it may be necessary to carry out an investigation at a later stage which may be formal or informal depending on the nature of the concern raised. External investigators may be brought in where necessary. LCCA will endeavour to complete investigations within a reasonable time.
- 5.4 LCCA will keep you informed of the progress of the investigation carried out and when it is completed, and give an indication of timings for any actions or next steps that LCCA will take, but LCCA will not be able to inform you of any matters which would infringe any duty of confidentiality owed to others.
- 5.5 If it is determined that a concern should be dealt with under another internal procedure, we will notify you of that decision. That internal procedure will take place in the normal way and in accordance with any relevant policies.

Section 6: If you are not satisfied

- 6.1 While we cannot guarantee a particular outcome you may be seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.
- 6.2 If you are not happy with the way in which your concern has been handled, you may contact the Executive Dean in the first instance. In the event your concern is regarding this individual, you may contact the Managing Director.

Section 7: Confidentiality

- 7.1 LCCA hopes that all students will feel able to voice concerns openly under this policy; however, should you wish to raise a concern confidentially, all such concerns shall be treated

in confidence and every effort will be made not to reveal your identity to anyone other than those involved in investigating the concern. If it becomes necessary for anyone else to know your identity in order to investigate the concern adequately, LCCA will discuss this with you first. Furthermore, if disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of a disclosure without your help, so you may be asked to come forward as a witness. If you agree to this, you will be offered advice and support.

- 7.2 Whilst a concern may be made anonymously, LCCA encourages you to put your name to the allegation whenever possible. If this is not done, it will be much more difficult for LCCA to give feedback on the outcome of investigations. Concerns that are expressed completely anonymously are much less powerful and are difficult to investigate. LCCA will consider them at its discretion, taking into account factors such as the seriousness of the issue raised, the credibility of the concern and the likelihood of confirming the allegation from other sources.

Section 8: Raising your concern externally (exceptional cases)

- 8.1 The main purpose of this policy is to give all our students the opportunity and protection they need to raise concerns internally. LCCA would expect that in almost all cases raising concerns internally would be the most appropriate course of action.
- 8.2 However, if for whatever reason, you feel that you cannot raise your concerns internally and you reasonably believe the information and any allegations are substantially true, it may be appropriate for you to raise the matter with an external body, such as a regulatory or professional body. In this case, we recommend that you direct your concern to the regulator of higher education, the Office for Students (OfS). The procedure for notifying the OfS is available on their website at: <https://www.officeforstudents.org.uk/for-students/understanding-students/complaints/complaints-about-a-university-or-college/>

Section 9: Protection and support for those raising concerns

- 9.1 LCCA is committed to good practice and high standards and to being supportive to students who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 9.2 Any student raising a genuine concern shall not suffer any detriment to their studies, results or qualifications obtained as a result of doing so. If an individual believes that they have suffered such treatment, they should inform the Executive Dean immediately.
- 9.3 LCCA will not tolerate any harassment or victimisation of any individual who has raised a concern under this policy. It should be noted that harassing or victimising individuals for raising concerns amounts to misconduct and could lead to disciplinary action.
- 9.4 Provided reports are made in good faith, then an individual is protected by the LCCA against harassment or victimisation and the individual's confidentiality must be preserved.
- 9.5 However, to ensure the protection of all our students, those who raise a concern maliciously and/or for personal gain and/or make an allegation they do not reasonably believe to be true may also be liable to disciplinary action under our Student Disciplinary policy.

- 9.6 The Executive Dean, on receiving notifications allegedly related to fraud, will inform the Chair of the Fraud and Theft Response Team in accordance with the Fraud Risk Management Policy. The Team will determine if the matter should progress through the Fraud and Theft Response route or the Whistleblowing route.

Section 10: Accessibility and Alternative Formats

- 10.1 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.

Document Information	
Document Code	GIC-018
Document Title	Student Whistleblowing Policy
Document Type	Policy
Version	1.0
Status	Approved
Classification	External
Approval Body	ARC
Date Approved	29 Jun 2026
Effective Date	29 Jun 2026
Review Date	Triennially, or Event-Driven
Executive Owner	Executive Dean
Author(s)	Group Legal
Equality Impact Assessment	Pending
Related Documents	Staff Whistleblowing Policy Anti-Bribery & Corruption Policy Fraud Risk Management Policy
Consulted	Committees and Sub-committees / Legal

Version Control			
Version	Date	Author	Summary of Changes
1.0	29-Jun-2026	Group Legal	Approved