

# Whistle Blowing Policy

**April 2026**

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## **1.0 Introduction**

It is BCNO's policy to conduct its business with honesty and integrity. We expect all employees, temporary workers, contractors and students to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, facilitation of tax evasion, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment, any breach of legal or professional obligations and any attempt or instruction to conceal any of the above.

This policy covers all employees, trustees, consultants, contractors, volunteers, student practitioners, casual workers and agency workers.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

## **2.0 Purpose**

The purpose of this policy is to enable employees and other members of the BCNO community to raise concerns about wrongdoing in a safe and responsible way. BCNO is committed to the highest standards of openness, probity, and accountability and recognises that effective whistleblowing arrangements are a key element of good governance.

This policy is intended to meet the requirements of the Public Interest Disclosure Act 1998 (PIDA) and reflects good practice within the UK Higher Education (HE) sector.

## **3.0 Scope**

This policy applies to:

- All employees of BCNO (including permanent, fixed-term, casual, and agency staff)
- Workers, contractors, consultants, patients and volunteers
- Students, where concerns relate to serious wrongdoing rather than personal complaints

This policy does not apply to personal grievances, which should be raised under the appropriate grievance, complaints, or student procedures.

## **4.0 Policy**

### **4.1 What is Whistleblowing?**

Under PIDA an individual is protected from suffering a detriment or from being dismissed if their disclosure is both a 'qualifying' and a 'protected' disclosure. There are three elements to a disclosure:

- Reasonable Belief: The individual must reasonably believe the information shows a relevant failure (see 4.2).
- Public Interest: The individual must reasonably believe the disclosure is in the

public interest (not just a personal grievance).

- Proper Channel: The disclosure must be made to an appropriate person or body (e.g., employer, regulator, or legal advisor).

#### **4.2 Relevant failures**

The relevant failures are:

- A criminal offence has been, is being, or is likely to be committed
- A person has failed, is failing, or is likely to fail to comply with a legal obligation
- A miscarriage of justice has occurred, is occurring, or is likely to occur
- The health or safety of any individual has been, is being, or is likely to be endangered
- Damage to the environment has been, is being, or is likely to occur
- The deliberate concealment of information about any of the above

#### **4.3 Examples of reasons for whistleblowing**

- Reporting fraud, embezzlement, bribery, or financial irregularities (e.g., falsifying records).
- Health and Safety dangers e.g. unsafe working conditions, violating building safety regulations.
- Environmental damage e.g. exposing illegal activities like dumping hazardous waste or polluting rivers.
- Failure to comply with laws, such as not having required insurance, ignoring data protection laws (e.g., GDPR).
- Miscarriages of justice e.g. reporting cases where an employee was unjustly dismissed or penalised.
- Reporting systemic severe bullying, harassment, sexual harassment and/or discrimination
- Reporting deliberate efforts to hide any of the above-mentioned activities.

#### **4.4 Principles**

BCNO:

- Encourages the reporting of genuine concerns at the earliest opportunity
- Will take all disclosures seriously and investigate them appropriately
- Will not tolerate harassment or victimisation of anyone who raises a concern in good faith

- Will treat disclosures confidentially, so far as is reasonably practicable
- Will ensure compliance with relevant legislation and regulatory expectations

## **4.5 Safeguards**

### Protection

BCNO aims to encourage openness and will support individuals who raise genuine whistle-blowing concerns under this policy, even if they turn out to be mistaken.

Whistle-blowers must not suffer any detrimental treatment as a result of raising a genuine concern. If an individual believes that they have suffered any such treatment, they must inform the Head of HR immediately. If the matter is not remedied, they should raise it formally using our Grievance Procedure.

No one should threaten or retaliate against whistle-blowers in any way. If individuals are involved in such conduct, this will be dealt with via the disciplinary process.

### Confidentiality

BCNO will make every effort to protect the identity of the whistleblower. However, there may be circumstances where disclosure of identity is unavoidable (for example, where required by law or in criminal proceedings).

### Anonymous Disclosures

Anonymous disclosures will be considered at BCNO's discretion. However, the ability to investigate may be limited if the source of the information is unknown.

### Malicious or Vexatious Allegations

If we conclude that an employee has made false allegations maliciously, in bad faith, without reasonable belief or with a view to personal gain, the matter will be dealt with via the disciplinary process.

## **4.6 How to raise a concern**

Concerns should normally be raised in the first instance with one of the following:

- Line Manager
- Student Welfare Officer
- Head of Department
- Head of College
- Head of Human Resources
- CEO

If the concern relates to senior management or the above routes are inappropriate, concerns may be raised with:

- The Chair of the Trustees

Concerns may be raised verbally or in writing and should, where possible, include:

- The nature of the concern
- Relevant background and history
- Names of individuals involved (where known)
- Any supporting evidence

BCNO encourages individuals to raise concerns internally in the first instance. However, PIDA recognises that in certain circumstances disclosures may be made to prescribed external bodies, such as:

- The Office for Students
- The National Audit Office
- The Health and Safety Executive
- The Charity Commission

Individuals are strongly encouraged to seek advice before reporting a concern to anyone externally. Protect (formally Public Concern at Work) operates a confidential helpline. Their contact details are at the end of this policy.

#### **4.7 Investigation and outcome**

All concerns raised under this policy will be assessed promptly with an acknowledgement of the concern within 3 working days of receipt. Where a concern can be managed via early resolution then this will be dealt with within 5 working days of receipt of the concern. If an investigation is required, BCNO will determine the most appropriate method of investigation, which may involve internal review, audit, or referral to external bodies. BCNO will aim to conclude the investigation and respond in full within 20 working days. If the concern requires a more prolonged investigation, then an extension to this deadline will be sought in discussion with the person raising the concern.

BCNO will arrange a meeting with the whistleblower as soon as possible to discuss their concern. The whistleblower may be accompanied to any meeting regarding their disclosure by a work colleague, or a recognized trade union representative.

Following that meeting, BCNO will arrange for an investigation to be carried out as appropriate. The whistleblower may be asked to provide additional information or statement(s).

The whistleblower will normally be informed:

- That the concern has been received
- How the matter will be handled
- The outcome of the investigation, subject to legal and confidentiality constraints

## 5.0 Contacts

Head of HR	Helen Jones <a href="mailto:Helen.jones@bcnogroup.ac.uk">Helen.jones@bcnogroup.ac.uk</a>
Head of College	Carl Norris <a href="mailto:Carl.norris@bcnogroup.ac.uk">Carl.norris@bcnogroup.ac.uk</a>
CEO	Ian Fraser <a href="mailto:ian.fraser@bcnogroup.ac.uk">ian.fraser@bcnogroup.ac.uk</a>
Chair of Trustees	David Tasker <a href="mailto:david.tasker@bcnogroup.ac.uk">david.tasker@bcnogroup.ac.uk</a>
Protect (formerly Public Concern at Work) (Independent whistle-blowing charity)	Helpline: (020) 3117 2520 Contact form: <a href="https://protect-advice.org.uk/contact-protect-advice-line/">https://protect-advice.org.uk/contact-protect-advice-line/</a> Website: <a href="http://www.protect-advice.org.uk">www.protect-advice.org.uk</a>

## 6.0 Auditing

Policy Name:	Whistle Blowing		
Policy Owner:	Human Resources		
Policy Approver:	Head of HR		
Audience:	All employees, agency and other workers		
Storage Location:	Intranet - HR		
Effective Date:	04.2026		
Review Date: (Unless other revisions are required prior to this date)	04.2027		
Version:	Approved version 1.4		
Equality Impact Assessment:	Are there any implications for a protected characteristic group as defined by the Equality Act 2010 in this policy?		
	<input type="checkbox"/> Positive Impact	<input type="checkbox"/> Negative Impact	<input checked="" type="checkbox"/> Neutral X
Details:	N/A		

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### Version History

Version	Date	Action	By
1.0	May 2022	Harmonisation of BCOM/ESO policy. Rebrand	HJ/JD
1.1	July 2023	Annual review – amend email addresses to BCNO	HJ/JD
1.2	June 2024	Annual review	HJ
1.3	April 2025	Annual review.	HJ
1.4	April 2026	Re-write of policy to provide greater detail of protected disclosures inc. sexual harassment	HJ