

Art Academy – Public Interest Disclosure (Whistleblowing) Policy

This Whistleblowing (Public Interest Disclosure) Policy has been informed by the following sector guidance and good practice frameworks:

- ***The UK Quality Code for Higher Education: Concerns, Complaints and Appeals*** (QAA, 2018), which sets out the expectations and practices relating to effective and transparent procedures in UK higher education. Available at: <https://www.qaa.ac.uk/en/quality-code/advice-and-guidance>
 - ***Office of the Independent Adjudicator (OIA) Good Practice Framework***, which provides guidance on the handling of student complaints and appeals. Available at: <https://www.oiahe.org.uk/resources-and-publications/good-practice-framework/handling-complaints-and-academic-appeals/>
 - ***Public Interest Disclosure Act 1998 (PIDA)***, the UK legislation providing legal protection for individuals who disclose concerns in the public interest.
 - ***ACAS Guidance on Whistleblowing***, which offers advice to employers and workers on handling whistleblowing disclosures responsibly and fairly. Available at: <https://www.acas.org.uk/whistleblowing-at-work>
-

List of appendices:

Appendix A - Whistleblowing Policy – Summary Guide for Staff & Students

1. Purpose

The Art Academy is committed to maintaining the highest standards of honesty, propriety, and accountability in all its activities. This policy aims to ensure that staff, students, contractors, and others feel able to raise genuine concerns about wrongdoing or malpractice without fear of reprisal, and that any such concerns are properly investigated and resolved. This policy aligns with the Public Interest Disclosure Act 1998 and related UK legislation, and reflects the OU's expectations for validated institutions.

2. Scope & Applicability

This policy applies to:

All employees of the Art Academy (permanent, fixed-term, part-time)
Contractors, agency staff, visiting lecturers, students, volunteers, governors, and any other persons engaged in activities on behalf of the Academy

It covers concerns raised in the reasonable belief that it is in the public's best interest to be made aware of malpractice or wrongdoing.

3. Definitions / Qualifying Disclosures

A qualifying disclosure is one made by an individual in the reasonable belief that it is in the public interest and who reasonably believes that one or more of the following is happening, has happened, or is likely to happen:

- A criminal offence (fraud, theft, bribery)
- Failure to comply with a legal obligation
- A miscarriage of justice
- Risk to health & safety of any individual
- Damage to the environment
- Abuse of authority or position
- Concealment or suppression of any of the above

4. What is Not Covered

This policy is not intended to replace:

The Grievance procedure for complaints or concerns relating exclusively to individual employment terms (unless they also amount to public interest wrongdoing)

The Student Complaints and Appeals procedures

Academic misconduct or student discipline procedures, except where they overlap with the wrongdoing defined above

5. Reporting Routes & Contacts

You are encouraged to raise concerns promptly. The following routes are available:

- First-line: Your line manager or supervisor – for concerns you believe are serious but not implicating senior staff or yourself
- Second-line: Designated Whistleblowing Officer – if your manager is implicated, or if you believe earlier route is inappropriate

- Senior / External: Principal / Chair of Trustees – if senior leadership is involved, or other routes are unavailable
- OU Contact: studentcaseworkoffice@open.ac.uk Where the concern pertains to OU-regulated awards or external validation matters

Contact details:

- Whistleblowing Officer: Thomas Groves [Thomas@artacademy.ac.uk]
- HR Lead: Emily Barnes [Emily@artacademy.ac.uk]
- Principal: Rob Pepper [Rob@artacademy.ac.uk]
- Chair of Trustees: Damian Fennell (damian@artacademy.ac.uk)

6. Confidentiality & Anonymity

Your identity will be protected and remain confidential as far as possible, especially if you request anonymity. However, in some investigations it may be necessary to disclose details in order to investigate effectively. If so, you will be informed. Anonymous reports will be accepted, but may limit the scope or depth of investigation if details are unclear or unverifiable.

7. Protection & Support

The Art Academy will ensure that anyone who raises a concern made in the reasonable belief that it is in the public interest will not suffer retaliation or detriment (dismissal, demotion, harassment, etc.). Legal protection under the Public Interest Disclosure Act 1998 (and any amendments) is acknowledged. Support will be offered (via HR / Employee Assistance Program / Student Support services) to help with any distress or pressures resulting from the disclosure.

8. Investigation Procedure

1. Acknowledgement: The person raising a concern will receive acknowledgement in writing within 5 working days.
2. Initial review: The Whistleblowing Officer, or other appointed person, will review whether the concern qualifies under this policy.
3. Investigator appointment: If appropriate, an investigator unaffiliated with those implicated will be appointed.

4. Investigation: Conducted promptly, objectively, gathering evidence and allowing affected parties to respond.

5. Outcome & communication: The outcome of the investigation, including what action will be taken (if any) will be communicated to the whistleblower, where possible. If no action is taken, reasons will be provided.

6. Appeals: The whistleblower or those implicated may appeal the outcome to the Chair of Trustees within 21 working days.

9. Record Keeping, Reporting & Governance

Records of disclosures, actions taken, and outcomes will be securely maintained for at least 3 years. The Whistleblowing Officer will report to the Board of Trustees on the number and types of disclosures (anonymised), outcomes, and any learning actions. The policy and its effectiveness will be reviewed every 3 years by the Board of Trustees and updated as needed.

10. Links to Related Policies

This policy should be read alongside:

- Grievance Procedure
- Student Complaints & Appeals
- Academic Misconduct / Research Integrity Policy
- Equality, Diversity & Inclusion Policy
- Data Protection & Privacy Policy

11. External Contacts & Legal Rights

If you feel that you cannot use internal routes, or if you have raised a concern and believe it has not been properly dealt with, you may contact:

- External regulators relevant to the misconduct (OfS, etc.)
- The OU validation office (for matters related to OU awards)
- Other “prescribed persons” under PIDA where applicable
- Legal advisers as appropriate

Document name	Public Interest Disclosure (Whistleblowing) Policy and Procedure	Document owner	Thomas Groves Quality Manager
Date originally created	September 2025		
Version	1	Review date	September 2028
Author of amendments		Next review date	September 2028
Changes (list sections)			
Approved by	Exec on behalf of the Board of Trustees	Date of approval	14/10/25