WHISTLEBLOWING POLICY

Public Interest Disclosure and Protected Reporting

Ignition Pro - School for Entrepreneurs Limited

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1. POLICY STATEMENT

Ignition Pro - School for Entrepreneurs Limited is committed to the highest standards of integrity, transparency, and accountability in all its operations. The institution recognizes that all members of the organization - staff, students, governors, contractors, and stakeholders - have an important role to play in identifying and reporting wrongdoing, malpractice, or concerns about improper conduct.

This Whistleblowing Policy provides a safe, confidential, and protected mechanism for individuals to raise genuine concerns about suspected wrongdoing without fear of retaliation or detriment. The policy supports compliance with the Public Interest Disclosure Act 1998 (PIDA), which protects workers who make qualifying disclosures in the public interest, and with Office for Students ongoing registration condition E8, which requires institutions to prevent, detect, and stop prohibited conduct relating to relevant public funds.

The institution will not tolerate harassment, victimization, or any form of retaliation against individuals who raise concerns in good faith through appropriate channels. Whistleblowing is actively encouraged as a demonstration of commitment to institutional values and regulatory compliance. All reports will be treated seriously, investigated appropriately, and handled confidentially to the maximum extent possible.

2. SCOPE AND APPLICATION

2.1 Who is Covered

This policy applies to all individuals associated with the institution, including:

- All employees (permanent, fixed-term, part-time, full-time)
- Agency workers and temporary staff
- Contractors, consultants, and service providers
- Volunteers and adjunct faculty
- Board members and governors
- Students enrolled at the institution
- Former employees and students (for matters occurring during their association)

2.2 What Should Be Reported

This policy is intended for reporting serious concerns about wrongdoing or malpractice that are in the public interest. Examples of matters that should be reported under this policy include:

- Fraud, theft, or misappropriation of funds (including Student Loans Company tuition fee loans or any relevant public funds)
- Bribery, corruption, or acceptance of inducements
- Deliberate falsification of student enrollment, attendance, or engagement records
- Submission of false or misleading data to regulatory bodies (OfS, SLC, HESA)
- Gross mismanagement or serious incompetence affecting relevant public funds
- Deliberate concealment of information about any of the above matters
- Criminal offenses or unlawful conduct
- Serious breaches of health and safety regulations
- Serious risks to students, staff, or the public
- Serious breaches of professional standards or codes of conduct

- Environmental damage or serious regulatory breaches
- Deliberate attempts to conceal any of the above

2.3 What is Not Covered by This Policy

This whistleblowing policy is not appropriate for the following matters, which should be raised through alternative procedures:

- Personal employment grievances (use Grievance Policy)
- Complaints about fellow students (use Student Complaints Policy)
- Academic matters or teaching quality concerns (use Academic Quality Procedures)
- Contractual disputes or terms and conditions issues

If you are uncertain whether a matter should be raised under this policy or another procedure, you may contact the Chief Executive Officer or Board Chair for guidance.

3. REPORTING CHANNELS

The institution provides multiple confidential channels for raising concerns, allowing individuals to choose the route most appropriate to the circumstances. Concerns may be raised verbally or in writing.

3.1 Internal Reporting Channels

Channel 1: Line Manager

For many concerns, the appropriate first point of contact is your immediate line manager. If the concern relates to matters within their authority to address, and you are comfortable raising it with them, this may be the quickest route to resolution. Line managers who receive whistleblowing reports must immediately escalate to the CEO.

Channel 2: Chief Executive Officer / Accountable Officer

The CEO serves as the designated Whistleblowing Officer for the institution. Concerns about fraud, financial irregularities, data falsification, or other serious matters relating to public funds or regulatory compliance should be reported directly to the CEO. Reports may be made verbally or in writing to: ceo@ignition-pro.com or via sealed envelope marked 'Private and Confidential - Whistleblowing' addressed to the CEO.

Channel 3: Board Chair

If the concern relates to the CEO, or if you have reported to the CEO but believe the matter has not been handled appropriately, you may report directly to the Board Chair. Contact details: chair@ignition-pro.com or via sealed envelope marked 'Private and Confidential - Board Chair - Whistleblowing'.

3.2 External Reporting Channels

Office for Students Whistleblowing Channel

If you believe that internal reporting would be ineffective, inappropriate, or if you have reported internally without satisfactory response, you may report concerns directly to the Office for Students. The OfS operates a dedicated whistleblowing channel for concerns about registered higher education providers. Contact: whistleblowing@officeforstudents.org.uk. The institution will not penalize legitimate use of the OfS whistleblowing channel.

Other Prescribed Regulators

Certain types of concerns may be reported to other regulatory or law enforcement bodies including: Student Loans Company for concerns about fraudulent SLC funding claims, Information Commissioner's Office for serious data protection breaches, Health and Safety Executive for serious safety risks, Police for suspected criminal offenses, HM Revenue & Customs for tax fraud concerns.

3.3 Anonymous Reporting

While the institution encourages individuals to provide their identity to facilitate investigation and feedback, anonymous reports will be accepted and investigated to the extent possible. However, anonymous reporting may limit the institution's ability to investigate thoroughly, protect the reporter from retaliation, or provide feedback on the outcome. Anonymous reports may be submitted via anonymous email accounts or sealed envelopes without return address.

4. HOW TO RAISE A CONCERN

4.1 Information to Provide

To enable effective investigation, please provide as much information as possible including:

- Nature of the concern - what wrongdoing or malpractice do you believe is occurring?
- Background and history - when did the matter start? Has it happened before?
- Individuals involved - who is involved? Who has knowledge of the matter?
- Evidence - what evidence supports your concern? (documents, emails, records, etc.)
- Witnesses - who else may have relevant information?
- Timing - is there urgency? Are there deadlines or time-sensitive issues?
- Previous action - have you raised this elsewhere? What was the response?

You are not expected to investigate the matter yourself or prove that wrongdoing has occurred. The purpose of providing information is to enable the institution to assess the concern and conduct appropriate investigation.

4.2 Acting in Good Faith

This policy protects individuals who raise concerns in good faith - meaning you genuinely believe the information is substantially true and you are reporting it in the public interest. You do not need to be certain that wrongdoing has occurred; a reasonable suspicion is sufficient. However, deliberately false or malicious allegations may result in disciplinary action. If you are unsure whether to raise a concern, you are encouraged to discuss the matter confidentially with the CEO or Board Chair.

5. INVESTIGATION PROCESS

5.1 Initial Assessment

Upon receipt of a whistleblowing report, the CEO (or Board Chair if the report concerns the CEO) will conduct an initial assessment within 5 working days. The assessment will determine the seriousness of the allegation, whether investigation is required, whether immediate action is needed to prevent harm or preserve evidence, who should conduct the investigation, and what resources or external expertise may be required. The reporter will be acknowledged within this timeframe, unless the report was submitted anonymously.

5.2 Investigation

Investigations will be conducted promptly, thoroughly, and fairly. The investigator will be appropriately senior, independent of the matter under investigation, and will have the authority to access necessary information and interview relevant individuals. Investigations will typically be completed within 30 working days, though complex matters may require longer timescales. The investigator will maintain confidentiality to the greatest extent possible, consistent with conducting a thorough investigation.

Investigation methods may include review of documents and records, interviews with relevant individuals, examination of systems and processes, consultation with external experts if required, and review of relevant policies and procedures. The investigation will be conducted objectively, following evidence rather than assumptions, and will document findings clearly.

5.3 Investigation Outcomes

Upon completion of the investigation, a written report will be prepared setting out the allegations, investigation process followed, evidence gathered, findings and conclusions, and recommendations for action. The investigation may conclude that the allegations are substantiated wholly or in part, unsubstantiated, made in good faith but investigation found no evidence of wrongdoing, or made maliciously or vexatiously.

5.4 Action Following Investigation

If the investigation substantiates wrongdoing, appropriate action will be taken which may include disciplinary action against individuals involved, changes to policies, procedures, or systems, reporting to regulatory authorities as required, recovery of losses where applicable, and implementation of recommendations to prevent recurrence. The Board of Governors will be notified of all substantiated cases and the actions taken.

5.5 Feedback to Reporter

If you have provided your identity, you will receive feedback on the outcome of the investigation, subject to confidentiality and data protection obligations. The level of detail provided will depend on the circumstances, but you will be informed whether the investigation concluded the concern was substantiated, what action has been or will be taken, and whether any follow-up is required from you. You will not normally be provided with confidential details about disciplinary action taken against individuals.

6. PROTECTION FROM RETALIATION

The institution is committed to protecting individuals who raise concerns in good faith from any form of retaliation, detriment, or victimization. This protection applies regardless of whether the investigation ultimately substantiates the concern, provided it was raised in good faith.

6.1 What Constitutes Retaliation

Retaliation includes any adverse action taken because an individual has raised a concern. Examples include:

- Dismissal, demotion, or denial of promotion
- Harassment, bullying, or intimidation
- Unwarranted disciplinary action or unfavorable performance reviews
- Exclusion from teams, meetings, or opportunities
- Unjustified changes to duties, responsibilities, or working conditions
- Threats, coercion, or blackmail

6.2 Protection Measures

The institution will take all reasonable steps to protect whistleblowers including maintaining confidentiality of identity, monitoring for any signs of retaliation, providing support and counseling if required, taking immediate action to stop retaliation if it occurs, and investigating any allegations of retaliation with potential disciplinary consequences.

6.3 Consequences of Retaliation

Retaliation against a whistleblower is itself a serious disciplinary offense that may result in summary dismissal for gross misconduct. Any individual who retaliates against someone for raising a concern in good faith will face disciplinary action regardless of their position in the institution. The institution will support legal action by whistleblowers who suffer retaliation, including providing evidence for employment tribunal claims.

6.4 Legal Protections

The Public Interest Disclosure Act 1998 provides legal protection to workers who make qualifying disclosures in the public interest. Protected disclosures must relate to specific categories of wrongdoing, be made in good faith, and be made to an appropriate person or body. Workers who make protected disclosures are protected from dismissal or detriment. Employment tribunals can award unlimited compensation for dismissal or detriment suffered as a result of whistleblowing.

7. CONFIDENTIALITY

The institution is committed to handling whistleblowing reports with appropriate confidentiality to protect both the reporter and those accused of wrongdoing.

7.1 Reporter Confidentiality

The identity of individuals who raise concerns will be kept confidential to the maximum extent possible. Information will only be shared on a need-to-know basis with those involved in investigating or addressing the concern. The reporter's identity will not be disclosed without their express consent, unless disclosure is required by law, necessary for proper investigation, or essential to protect individuals from serious harm.

There may be circumstances where the nature of the allegation or evidence provided makes it possible for individuals to deduce the reporter's identity. The institution will discuss such risks with the reporter and take additional protective measures where appropriate.

7.2 Investigation Confidentiality

All individuals involved in investigating or addressing a whistleblowing concern must maintain confidentiality. Unauthorized disclosure of information about a whistleblowing investigation may itself be a disciplinary offense. Records relating to whistleblowing investigations will be stored securely with access restricted to authorized individuals.

8. RECORD KEEPING AND REPORTING

The institution maintains comprehensive records of all whistleblowing reports to support transparency, accountability, and continuous improvement.

8.1 Whistleblowing Register

The CEO maintains a confidential Whistleblowing Register recording all reports received, investigation actions taken, outcomes, and any follow-up measures. The register includes the date received, nature of concern, reporting channel used, assigned investigator, investigation timeline, findings and outcome, and action taken. Personal identifying information is stored separately with restricted access.

8.2 Board Reporting

The Board of Governors receives a quarterly report on whistleblowing activity including the number of reports received, categories of concerns raised, investigation outcomes, actions taken, and any identified trends or systemic issues. Individual reporters are not identified in Board reports unless the case requires Board-level decision-making.

8.3 Regulatory Reporting

Where whistleblowing investigations identify matters that constitute reportable events to the Office for Students or other regulators, the institution will make appropriate notifications in accordance with regulatory requirements. This includes matters relating to fraud, serious irregularities affecting public funds, serious breaches of registration conditions, or other material issues affecting institutional viability or student protection.

9. TRAINING AND AWARENESS

All staff will receive training on whistleblowing as part of induction and through annual refresher training. Training will cover what constitutes a whistleblowing concern, how to raise concerns through appropriate channels, protection from retaliation, confidentiality provisions, and the institution's commitment to acting on concerns raised. Managers will receive additional training on receiving and handling whistleblowing reports appropriately.

The policy will be published prominently on the institutional website and intranet. Posters summarizing reporting channels will be displayed in staff and student areas. Students will be made aware of whistleblowing provisions through student handbooks and orientation programs.

10. POLICY REVIEW

This policy will be reviewed annually by the Board to ensure continued effectiveness and compliance with legal and regulatory requirements. The review will consider the number and nature of reports received, effectiveness of investigation processes, any issues with retaliation or confidentiality, feedback from users of the policy, changes in legislation or regulatory guidance, and sector best practice. Material changes require Board approval.

11. KEY CONTACTS

Role	Contact Information
Chief Executive Officer / Whistleblowing Officer	ceo@ignition-pro.com
Board Chair	chair@ignition-pro.com (Confidential)
Office for Students Whistleblowing	whistleblowing@officeforstudents.org.uk
Protect (Independent Whistleblowing Charity)	020 3117 2520 | www.protect-advice.org.uk