



**Dumfries and  
Galloway College**

One step ahead

# WHISTLEBLOWING POLICY

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**Responsibility: Governance Professional**

**Issue Date: 8<sup>th</sup> December 2025**

**Equality Impact Assessment: 1<sup>st</sup> December 2025**

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Version: 2



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# Whistleblowing Policy

## 1. Purpose

1.1 Dumfries and Galloway College is committed to the highest standards of professional practice and good governance and will treat reports of suspected misconduct seriously.

## 2. Scope

2.1 Provide ways for employees/workers to raise concerns and receive feedback.

2.2 Inform employees/workers on how to take the matter further if they are dissatisfied with the response.

2.3 Reassure employees/workers that they will be protected from detrimental treatment for ‘whistleblowing’ in good faith and in the public interest.

### 3. *References*

- 👉 Public Interest Disclosure Act

### 4. *Definitions*

4.1 A whistleblower is a person who raises a genuine concern relating to any of the issues below. It is not necessary for a whistleblower to have proof misconduct is being, has been, or is likely to be committed – a reasonable belief, suspicion or concern is sufficient. Staff are not responsible for investigating a suspicion or concern – it is for the College to carry out an investigation once it has received a report.

### 5. *Responsibility*

5.1 The Board of Management is responsible for approving this Policy and the Audit Committee have oversight of its effectiveness.

5.2 The Governance Professional is responsible for compliance of this Policy.

5.3 Every employee has a duty and responsibility to disclose information in good faith, which they believe shows significant malpractice or wrongdoing within the college.

5.4 On receipt of a complaint, the Governance Professional will liaise with the relevant SLT member and select an Investigating Officer.

5.5 The Investigating Officer will undertake the role independently. Initially they will conduct enquiries to determine whether an investigation should take place, findings of which, will be reported to the Governance Professional.

## 6. *Policy*

6.1 This policy is intended to promote the disclosure of information which relates to suspected misconduct or dangers to the College. This may include: -

- ▶ that a criminal offence has been committed, is being committed or is likely to be committed.
- ▶ a failure to comply with a legal obligation.
- ▶ a miscarriage of justice.
- ▶ danger to health or safety of any individual.
- ▶ damage to the environment.
- ▶ financial or non-financial maladministration and misconduct.
- ▶ obstruction or frustration of the exercise of academic freedom.
- ▶ academic or professional misconduct of a serious nature.
- ▶ improper conduct or unethical behaviour of a serious nature.
- ▶ unauthorised disclosure of confidential information.
- ▶ breach of the College's internal policies and procedures; or
- ▶ the deliberate concealment of information relating to any of the above matters.

6.1.2 The above list of examples is not intended to be exhaustive and there may be other examples of misconduct or wrongdoing which it would be appropriate to consider under this policy. The Whistleblowing policy is specifically for those types of incidents detailed above, there are other procedures that may be relevant for workplace employment issues and for stakeholder complaints.

6.1.3 For minor issues employees should normally raise concerns with their line manager or, failing whom, another senior manager. Section 4 details how the concern will be dealt with.

6.1.4 The Whistleblowing Policy is expected to be used for serious and sensitive issues or exceptionally serious issues (e.g. corruption, fraud, bribery, unlawful acts) and the first step will be to raise the concern with the Governance Professional who will then raise the matter with the relevant SLT member (unless they, or senior management

collectively, are the subject of the complaint in that case the Principal should be contact or failing that the Chair of the Board of Management.

6.2 To raise a concern:

You should contact the Governance Professional –  
[boardsecretary@dumgal.ac.uk](mailto:boardsecretary@dumgal.ac.uk)

All issues raised within this policy are treated in confidence. To maintain confidentiality the Secretary will support the senior member of staff selected to investigate the concern.

6.3 When a concern is raised the Governance Professional should inform the Chair of the Board of Management, the Principal and the Chair of the Audit Committee. If any of those individuals are involved in the concern raised, they will not be informed until it is determined an investigation is necessary.

6.4 When you raise a concern, where possible the following should be included:

- The background and history of the concern, giving names, dates and places.
- The reason why you are particularly concerned about the situation. Those who do not feel able to put their concern in writing can telephone or meet the appropriate officer. The earlier the concern is expressed, the easier it is to take action.

6.5 Although employees are not expected to prove the truth of an allegation, they will need to demonstrate to the Governance Professional of Management there are sufficient grounds for concern, i.e. they have an honest and reliable suspicion or belief that malpractice or wrongdoing has happened, is happening, or is likely to happen.

6.6 Employees should not attempt to investigate the matter themselves. This policy provides an appropriate means to raise whistleblowing concerns and is intended to protect all parties involved in such a process.

6.7 Concerns reported under this policy will be taken seriously and investigated. Investigations will be undertaken as quickly as practicable following a report to the Governance Professional to ensure that the

quality or depth of the investigation is not affected. Findings will be determined on the balance of probabilities – that is, whether the evidence shows it is more likely than not that the concern raised is valid. The seriousness and complexity of the reported concern will have an impact on the time needed to carry out and conclude an investigation, and in some instances, it may be necessary to refer a matter to an external advisor.

- 6.8 In the investigation, where the issue is referred to an outside body, there will first be a preliminary internal investigation. It is however recognised that due to the nature of the concern the member of SLT investigating may inform Police Scotland, the College's Auditors or other relevant external organisations.
- 6.9 All investigations conducted will be undertaken by a member of SLT as identified by the Governance Professional.
- 6.10 Initial enquiries by the SLT member will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations which fall within the scope of other, existing procedures, will follow the relevant one.
- 6.11 Within 15 working days of a concern being received, the Governance Professional of Management will write to the employee who raised the issue:
  - Acknowledging that the concern has been received
  - Indicating how the matter is to be dealt with
  - Indicating whether further investigations will take place, and if not, why not.
- 6.12 This policy encourages employees to put their names to allegations. Concerns expressed anonymously are much less powerful, and whether they will be followed up is at the discretion of the Governance Professional.
- 6.13 The amount of contact between the person raising the concern and the investigator will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided. If necessary, further information may be sought from the individual.

6.14 The employee needs to be assured that the matter has been properly addressed. Thus, subject to legal constraints, they will receive summary information indicating their concerns have been addressed.

6.15 In the investigation of the matter the SLT investigator should reach a decision on the issue raised and should prepare a report which is shared with the Principal, Chair of the Board and should be table at the next available Audit Committee meeting.

6.16 If the person raising the matter is not happy with the outcome as communicated by the Governance Professional, they have the right of appeal to the Principal. This appeal should be submitted within 10 days of receipt of the College decision. The Principal will normally consider the appeal and their decision is final.

6.17 The aim of this policy is to provide a robust internal mechanism for reporting, investigating and remedying any wrongdoing in the college. In most cases employees should not find it necessary to alert anyone externally. However, in some circumstances it may be appropriate for staff to report their concerns to an external body such as a regulator or the police. The College strongly encourages staff to seek advice before reporting a concern to anyone external and, other than in exceptional circumstances, all concerns should be raised internally in the first instance. If an individual believes that they have no choice but to raise a matter externally, caution and responsibility should be exercised in so doing.

6.17.1 The avenues open include:

- The Scottish Funding Council (<http://www.sfc.ac.uk/>);
- The Police (<http://www.scotland.police.uk>);
- Audit Scotland (<http://www.audit-scotland.gov.uk/>);
- a Trade Union or professional body; or relevant prescribed bodies - [List of prescribed bodies](#)

6.18 Protection and support for those who raise concerns

6.18.1 The College aims to encourage openness and will support those individuals who raise genuine concerns in the public interest under this policy, even of those concerns turn out to be mistaken.

6.18.2 Individuals raising matters must not suffer any detrimental treatment as a result of raising a concern in good faith. Detrimental treatment

includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If the person raising a matter believes that they have suffered any such treatment, they should inform the Governance Professional immediately. If the matter is not remedied to their satisfaction, staff would normally be directed to the College's Grievance Policy and Procedure.

- 6.18.3 Individuals in the College must not threaten or retaliate against anyone who raises a concern under this policy in any way. Anyone involved in such conduct will be subject to disciplinary action.
- 6.19 Malicious and Nefarious Allegations
- 6.19.1 It should be noted, that if it is concluded that the person raising the matter has made false allegations maliciously, persistently (including using other College policies and procedures), in bad faith or with a view to personal gain, they will be subject to appropriate action, for example, if it is a member of staff, it would be disciplinary action and may constitute gross misconduct.

## 7. *Distribution*

All Staff  
Repository

## 8. *Revision Log*

Date	Section	Description
18.01.22	All sections	Whistleblowing Policy introduced
December 2025	Format	Updated to reflect Document Control layout with Equality Impact Assessment added as Appendix 1
December 2025	Responsibility (front cover) and throughout the policy	Changed title of Secretary to the Board of Management to Governance Professional
December 2025	Section 5 Responsibility	Added as per Document Control template
December 2025	Section 6 Policy	Added narrative regarding appeals and protection and a new heading for Malicious and Nefarious Allegations

THIS FORM TO BE UPDATED WHENEVER THERE IS A CHANGE IN ANY SYSTEM DOCUMENT				
Document Name	Document Owner	Revision Number	Date of Issue	Date of Withdraw
Whistleblowing Policy	Secretary to the Board of Management	1	05.05.22	
Whistleblowing Policy	Governance Professional	2	08.12.25	

## Appendix 1 – Equality Impact Assessment

Document:	Whistleblowing Policy
Executive Summary:	This Policy provides guidance to all members of College Staff /Workers on how to inform management if they are concerned about serious malpractice, fraud or corruption within the College.

### Duties:

- 1: Eliminate discrimination, harassment and victimisation
- 2: Promote equality of opportunity
- 3: Promote good relations

\* Human Rights to privacy and family life, freedom of thought and conscience, education, employment

### PSED Impacts

	Commentary
Age	
Disability	
Gender	
Gender Based Violence	
Gender identity/ reassignment	
Marriage/civil partnership	
Pregnancy/maternity	
Religion or Belief	
Race	
Sexual Orientation	

## Additional Considerations

Care experienced	This policy has been developed to comply with UK law and will not have an adverse impact on people who share protected characteristics.
Carers	
Mental Health	
Socio-economic status	The Policy states that any investigation will be carried out as quickly as possible and in a confidential manner.
Veterans	
Human Rights*	

Lead Officer:	Governance Professional		
Facilitator:			
Date initiated:			
Consultation:	Public Interest Disclosure Act 1998		
Research:			
Signature	L. Grierson	Date	1 <sup>st</sup> December 2025