



# QAHE Limited

# Whistleblowing Policy

Prepared by: Chief Governance & Transformation Officer

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VO1	May 2026	Chief Governance & Transformation Officer	Policy based on the QA Group Whistleblowing Policy. Policy amended for the structure of QAHE and for approval by the Board of Directors.





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## 1. Introduction

QAHE Limited ("QA Higher Education") is committed to upholding the highest standards of governance, integrity and accountability in all its activities, and to fostering a culture in which individuals feel safe to speak up about suspected wrongdoing without fear of retaliation.

## 2. Purpose

This Whistleblowing Policy (the "Policy") provides guidance on how to raise concerns about suspected wrongdoing, malpractice, or misconduct, and explains the protection and support available to those who speak up.

It also sets out the arrangements for the effective management of whistleblowing concerns and explains how you can raise a concern under this Policy and assists you to report your concerns to the appropriate person or team to ensure they can be investigated and dealt with as quickly as possible.

This Policy does not form part of any contract of employment or student Terms and Conditions, and QA Higher Education may amend it at any time. QA Higher Education will review this Policy from time to time to ensure that it continues to reflect our legal obligations and QA Higher Education's institutional needs.

## 3. Scope

This Policy applies to all employees, workers including consultants, contractors and agency workers in relation to their work for QA Higher Education. This Policy also applies to students and members of the Board of Directors and any Committee of the Board.

It is not intended to address any general operational issues for complaints or concerns relating to your own personal circumstances. Personal concerns are not covered by whistleblowing legislation. For staff, these should be raised in the normal manner with your Line Manager or with the People Team, through QA Higher Education's formal Grievance Policy, details of which can be found on the "People Hub". For students, any such concerns should be raised under QA Higher Education's Student Complaints Procedure [qahe.complaints@qa.com](mailto:qahe.complaints@qa.com).

## 4. What is a Whistleblower?

A whistleblower is a person who raises a concern about suspected wrongdoing, malpractice, misconduct, or a serious risk to QA Higher Education, its staff, students, or the public, based on a reasonable belief that the concern is in the public interest. The alleged wrongdoing can be classified in many ways: violation of company policy/rules, law, regulation, or threat to public interest/national security, as well as fraud, and corruption.

Those who become whistleblowers can choose to raise concerns either internally, through the channels set out in section 6 of this Policy, or externally.

## 5. Examples of Whistleblowing Concerns

**Whistleblowing** is the disclosure of information which relates to suspected wrongdoing or dangers in relation to QA Higher Education. This may include:

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- (a) criminal activity;
- (b) failure to comply with any legal, professional, or regulatory obligation;
- (c) miscarriages of justice;
- (d) danger to health and safety;
- (e) damage to the environment;
- (f) serious misconduct, including harassment or bullying, where there is a wider public interest concern;
- (g) bribery under our Anti-Bribery Policy;
- (h) facilitating tax evasion contrary to our Anti-facilitation of Tax Evasion Policy;
- (i) financial fraud, irregularity, or mismanagement;
- (j) misuse of public funds;
- (k) tuition fee eligibility or funding irregularities;
- (l) attendance or engagement manipulation;
- (m) serious breaches of internal policies and procedures where there is a public interest concern;
- (n) conduct which seriously undermines institutional integrity, governance, or financial sustainability;
- (o) unauthorised disclosure or misuse of confidential information;
- (p) manipulation or falsification of data, including statutory or regulatory returns;
- (q) serious negligence or professional misconduct;
- (r) academic misconduct or practices that compromise academic standards or the integrity of awards;
- (s) research misconduct, including fabrication, falsification, or unethical practices;
- (t) safeguarding concerns, including failure to protect vulnerable individuals in accordance with our Safeguarding Policy;
- (u) non-compliance with immigration or student visa requirements (where applicable);
- (v) failure to provide accurate information to regulators or funding bodies;
- (w) the deliberate concealment of any of the above matters.

## 6. Raising your concerns

You can report concerns under this Policy where you reasonably believe there has been serious improper conduct or unethical behaviour that:

- may constitute a breach of the law; or
- Represents a significant departure from QA Higher Education's core principles and values.

Whistleblowing is intended for matters of public interest, including (but not limited to) fraud, misconduct, safeguarding concerns, regulatory breaches, or serious ethical failings.

This Policy is not intended for minor issues, personal grievances, or routine workplace concerns, which are covered in Section 3.

Reports should be made in writing to the designated Whistleblowing Officer at [qahe.whistleblowing@qa.com](mailto:qahe.whistleblowing@qa.com).

For employees, you can also report your concern through the confidential whistleblowing helpline run by **Safecall**, an independent third-party provider. If you prefer you can contact the whistleblowing helpline anonymously, the details of which are in Section 11.



For students, you can report your concern through **Your Safe Space**, the details of which are in Section 11.

## 7. Investigation of Concerns

All concerns raised are taken seriously. Upon receipt of a concern raised under this Policy, QA Higher Education will:

- acknowledge receipt of the concern within five (5) working days of receiving it;
- carry out an initial assessment to determine whether there is a prima facie case to answer and whether a formal investigation is warranted; and
- where a formal investigation is required, appoint an appropriate investigator and carry out the investigation promptly.

Your concern will be managed confidentially (section 8), and you will be kept informed of the progress of the investigation.

Any Personal Data (as defined in the Data Protection Act 2018) that you provide in connection with a whistleblowing report will be processed in accordance with all applicable data protection laws.

The Head of Legal and Director of People will determine whether any allegation of malpractice should be referred to external regulators and/or the Police, based on the seriousness of the allegation.

## 8. Confidentiality

You can raise your whistleblowing concerns openly under this Policy and your confidentiality will be respected. All information on the matter, including the identity of the individual(s) involved, will only be shared where necessary with the appropriate person(s) dealing with the case. The identity of the person raising a concern will not be disclosed to third parties or other staff without their consent, except to the extent required by law or by QA Higher Education's regulatory obligations.

For staff if you choose to use the **Safecall** service directly you will be asked if you wish to remain anonymous, or if you would like your identity shared with QA Higher Education.

For students if you choose to use the **Your Safe Space** service, you can choose whether you want to report the matter anonymously

## 9. Non-Retaliation

Retaliation in any form against individuals who raise a concern will not be tolerated and QA Higher Education is committed to ensuring that anyone who raises concerns is not victimised.

If you raise a concern based on a reasonable belief that wrongdoing, malpractice, or a serious risk has occurred, is occurring, or is likely to occur, you will not suffer any adverse consequences for speaking up, even if your concern was subsequently found to be mistaken. However, the protection afforded by this Policy does not extend to allegations that are knowingly false, malicious, or made with reckless disregard for the truth. Such conduct may result in disciplinary action.



Staff who believe that they are being retaliated against should report it immediately to their Line Management or to the Director of People, or (where the retaliation involves line management) to the designated Whistleblowing Officer at [qahe.whistleblowing@qa.com](mailto:qahe.whistleblowing@qa.com).

Any student who believes they have suffered any detriment to their studies, results or qualifications because of raising a concern should inform the designated Whistleblowing Officer at [qahe.whistleblowing@qa.com](mailto:qahe.whistleblowing@qa.com) immediately.

Any staff members found to be deliberately retaliating against a whistleblower will be investigated in accordance with QAHE's Disciplinary Policy and their action(s) may result in disciplinary action, up to and including, dismissal.

Alongside this commitment, staff whistleblowers also have statutory protection under the UK Public Interest Disclosure Act 1998 which protects workers from any detrimental treatment suffered as a result of raising a concern. Please note that the Public Interest Disclosure Act 1998 does not extend to students; however, QA Higher Education commits to affording students' protection from detriment under this Policy.

## 10. Reporting to the Audit and Risk Committee

A summary of all whistleblowing concerns raised, including the nature of the allegations, status of investigations, outcomes, and any resulting actions or control improvements, will be recorded in the Whistleblowing Register. This register, appropriately anonymised to protect confidentiality, will be reported to each meeting of the Audit and Risk Committee. The Committee will receive sufficient detail to enable effective oversight, identify trends, and ensure that concerns are being addressed promptly, fairly, and in accordance with this Policy and applicable legal and regulatory requirements.

## 11. Whistleblowing Helpline

The confidential whistleblowing helpline is run by Safecall which is an independent third-party provider. It offers a service that enables employees and workers to report malpractice, unlawful, or unethical behaviour within the workplace.

Safecall provides an independent confidential reporting line where staff can raise their concerns and be assured that they will be fully addressed. Calls are handled by skilled advisers and will be treated in complete confidence, unless you choose to share your contact details.

Staff can contact Safecall at any time and details of the Safecall service are also available on the People Hub and on QA Higher Education's intranet.

The Safecall service is available 24 hours a day, 7 days a week.

UK 0800 915 1571

Alternatively, Safecall can be contacted via their website: [www.safecall.co.uk/report](http://www.safecall.co.uk/report)

For students there are a variety of ways in which concerns can be raised, depending on the nature of the concern, however, "Your SafeSpace" allows for anonymous reporting where students can raise their concerns directly – [Your Safe Space: Report + Support – Fill out form](#)



## 12. Training and Awareness

QA Higher Education is committed to ensuring that all staff and students are aware of this Whistleblowing Policy and understand how to raise concerns. Whistleblowing awareness forms part of the mandatory induction for all staff and is reinforced through the mandatory training programme. This ensures that all individuals understand:

- what constitutes a whistleblowing concern;
- how to raise a concern safely and confidentially; and
- the protections available to those who do so.

In addition, QA Higher Education delivers dedicated whistleblowing training for managers and staff in designated roles. This training equips them to:

- recognise whistleblowing disclosures;
- distinguish whistleblowing from grievances or complaints;
- respond appropriately and sensitively to disclosures;
- escalate concerns in line with this Policy; and
- maintain confidentiality and protect those raising concerns.

Training is proportionate to role and responsibility and is reviewed regularly to ensure it reflects current legal, regulatory, and sector requirements. Completion of mandatory training is monitored, and refresher training is required periodically to maintain awareness and competence.

## 13. Review

This Policy will be reviewed every three years or sooner if required to ensure it remains accurate, effective, and aligned with legislation, regulatory, and institutional changes.

The Policy owner is responsible for initiating and coordinating the review of this Policy in line with the Policy Framework.

## 14. Useful links

The below links provide additional advice and guidance:

[Whistleblowing for employees: What is a whistleblower - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

[Protect - Speak up stop harm - Protect - Speak up stop harm \(protect-advice.org.uk\)](https://protect-advice.org.uk)