WHISTLEBLOWING POLICY

Version	1.1 – for approval
Effective date	On formal approval
Date for review	12 months after approval, or sooner if required
Policy owner	Chief Executive; independent oversight by the Governance Committee
Reference points	Employment Rights Act 1996, Part IVA, sections 47B and 103A; Public Interest Disclosure Act 1998; Employment Rights Act 2025, section 23; Equality Act 2010; UK GDPR and Data Protection Act 2018 (as amended); Acas whistleblowing guidance; BIMM University Safeguarding Policy, section 9, and Partner Handbook.
Audience/handling notes	Governance, staff, students, contractors, partners and external parties. Public policy; individual case records are restricted.
Dissemination and implementation plan	Publish on the NHAM website and reference in staff and student handbooks. Explain at induction; train those receiving concerns. Publish and test the confidential reporting contacts before implementation.
Linked Policies, Procedures and Forms	Safeguarding; Sexual Misconduct; Anti-Bribery, Fraud and Corruption; Risk Management; Equity, Diversity and Inclusion; Data Protection; Staff Grievance and Disciplinary Procedures; Student Complaints, Appeals and Disciplinary Procedures; Staff and Student Codes of Conduct.
Date approved	Pending formal approval; prepared 5 November 2026

1 Introduction

The Notting Hill Academy of Music (NHAM) encourages people to speak up about suspected wrongdoing. Concerns will be taken seriously, assessed impartially and acted on promptly. No person should be silenced, disadvantaged or threatened because they raise a concern covered by this policy.

This policy explains how to report concerns, how NHAM responds and how matters affecting BIMM University provision are escalated. It does not restrict statutory rights or access to external reporting routes.

2 Purpose and scope

This policy covers suspected wrongdoing connected with NHAM's activities, including teaching, assessment, recruitment, student funding, governance, employment, placements and relationships with industry partners. It applies to past, current and anticipated wrongdoing, including conduct away from NHAM premises or online.

Employees, workers, agency staff, visiting tutors, contractors, directors, volunteers, students, former staff and students, and external parties may use it. NHAM extends its commitment against retaliation to everyone using this policy. Legal whistleblowing protection depends on the individual's employment status and the disclosure; students and volunteers are not automatically protected by whistleblowing legislation.

3 What is whistleblowing?

A qualifying disclosure is a disclosure of information which a worker reasonably believes is in the public interest and tends to show one or more of the following:

- A criminal offence.
- Failure to comply with a legal obligation.
- A miscarriage of justice.
- Danger to someone's health or safety.
- Sexual harassment, expressly included in the legislation from 6 April 2026.
- Damage to the environment.
- Deliberate concealment of information about any of the above.

The concern may relate to something that has happened, is happening or is likely to happen. A protected disclosure is a qualifying disclosure made through a route recognised by law. Reasonable belief is required; proof and certainty are not. A concern can affect the person reporting it and still be in the public interest.

NHAM examples include falsified attendance or assessment records, misuse of student finance, bribery, concealment of safeguarding failures, unsafe teaching or placement arrangements, and pressure to suppress information supplied to BIMM or a regulator. Other serious integrity concerns will also be assessed under this policy, even if statutory protection is uncertain.

4 Relationship with other procedures

A complaint about an individual service, an academic appeal or a personal employment grievance will normally follow the relevant procedure. However, a complaint or grievance can also contain a public-interest disclosure. NHAM will identify and address both elements, explain the routes used and preserve applicable whistleblowing protections.

You do not need to label a concern "whistleblowing", use a particular form or select the correct procedure. Staff receiving a concern must route it securely to an appropriate, unconflicted recipient. This policy does not replace academic appeals or extend their deadlines.

5 How to raise a concern

You may report verbally, by email, in a private meeting or by sealed letter marked “Private and confidential – whistleblowing”. Use the contacts below. You may bypass your line manager or any person involved in the concern. You do not need their permission.

Primary recipient	Chief Executive, acting as NHAM’s Whistleblowing Officer. Name and direct confidential contact: [confirm before publication].
Independent alternative	Chair of the Governance Committee, where the Chief Executive is implicated, conflicted, unavailable or an inappropriate recipient. Name and direct confidential contact: [confirm before publication].
If both routes are conflicted	An independent recipient designated by NHAM’s unconflicted governing body, with authority to commission an external investigation. Name and direct confidential contact: [appoint and confirm before publication].
BIMM-related concerns	BIMM partnership/quality contact, or its designated senior alternative if that contact is implicated. Names and direct confidential contacts: [agree with BIMM before publication].
Immediate safeguarding concern	Contact NHAM’s Designated Safeguarding Lead or deputy immediately using the published safeguarding contacts. If either is implicated, use an unconflicted senior recipient and the appropriate statutory service. In an emergency call 999.

The Governance Committee must ensure the independent routes are genuinely accessible and do not pass through an implicated person. A shared general enquiries mailbox is not a substitute for a restricted reporting route. External options in section 10 remain available at any stage.

5.1 What to include

Where possible, explain what happened or may happen, when and where, who or what is affected, why you are concerned, any immediate risk, and whether you have reported it previously. Identify existing records or witnesses and tell us how and when it is safe to contact you. You can ask for confidentiality and explain any fear of retaliation.

You are not expected to investigate or gather proof. Preserve information already lawfully available to you; do not access records without authority, alter evidence or put yourself or others at risk. Ask for advice if unsure how to share material safely.

5.2 Anonymous reports and accessibility

Anonymous reports will be assessed on their content and available evidence, not dismissed because the reporter is unnamed. Anonymity may limit follow-up, investigation or feedback. Confidential reporting means NHAM knows your identity but restricts its use; it is different from anonymity.

NHAM will provide reasonable adjustments and accessible reporting arrangements, including help to record an oral account, additional processing time and an appropriate support person. No written form is compulsory.

6 How NHAM will respond

Working days in this policy mean Monday to Friday, excluding bank holidays in England. The following are NHAM service targets, not statutory deadlines. Urgent risks are acted on immediately; other timeframes must never delay safeguarding or a legal notification.

6.1 Receive and assess

The recipient will record the concern securely, acknowledge it within five working days where contact is possible, check conflicts of interest, and assess immediate risks to people, evidence, academic standards and public funds. They will agree safe communication and discuss confidentiality, support and protection from retaliation.

Within ten working days of receipt, NHAM will normally explain the next steps: investigation, referral to another appropriate process or authority, or no further action with reasons. The initial assessment must consider whether BIMM or a regulator needs prompt notification. It must not depend on proving the allegation first.

6.2 Investigate fairly

An unconflicted case manager will appoint a competent investigator with appropriate independence. An external investigator will be used where necessary because of seniority, expertise or conflicts. An implicated person must not appoint or direct the investigator, control case access or decide the outcome.

The investigation will have written terms of reference, proportionate evidence collection and a planned timetable. Relevant records must be preserved. Those facing allegations will have a fair opportunity to respond, at a time and in a manner that does not compromise safety, evidence or an external investigation. Allegations are not findings.

The reporter may be accompanied at meetings by a trade union representative, colleague or agreed support person, subject to confidentiality and absence of conflicts. NHAM will consider adjustments for everyone involved.

6.3 Updates, outcome and corrective action

NHAM will normally provide a progress update at least every twenty working days, including reasons for delay and a revised timetable. It will aim to conclude within thirty working days where the complexity permits; complex or externally led cases may take longer.

An unconflicted decision-maker will consider the findings, record conclusions and agree corrective action, owners and deadlines. This may include changes to controls, disciplinary proceedings under the appropriate procedure, support for affected people or external referral. The reporter will receive an outcome summary and explanation of action where lawful. Personal, disciplinary or legally privileged details may need to be withheld.

7 Review of handling or outcome

A reporter may request a review from the independent recipient within ten working days of the outcome, explaining any procedural failure, overlooked evidence or continuing concern. Later requests will be considered where reasonable. A reviewer uninvolved in the original decisions will assess the request and may require further investigation.

NHAM will acknowledge a review within five working days and aim to respond within twenty working days, explaining any extension. External reporting remains available without waiting for a review. Internal processes do not pause legal time limits.

8 Safeguarding and immediate risk

Where someone may be at risk of abuse or harm, the safeguarding procedure operates immediately alongside this policy. A student under 18 is a child even if they attend a higher education course or will turn 18 during the year. Do not wait for a whistleblowing meeting, a completed investigation or BIMM approval before taking necessary protective action or making an appropriate statutory referral.

Report promptly to the Designated Safeguarding Lead or an unconflicted alternative. Concerns about a person working with children must be considered for referral to the relevant local authority designated officer (LADO), with advice obtained before an internal investigation where required. Contact children's social care, adult safeguarding services or the police as appropriate. If the normal recipient fails to act or is implicated, escalate directly to an appropriate alternative or statutory service.

Notify BIMM's safeguarding lead promptly where its students or provision are affected. Coordinate the response with statutory agencies; do not compromise their enquiries. Necessary safeguarding information may be shared lawfully without consent. Explain confidentiality limits and do not promise secrecy.

9 BIMM University partnership responsibilities

NHAM retains responsibility for handling concerns about its own staff and operations. BIMM retains its awarding-body responsibilities. NHAM's case manager will promptly notify the designated BIMM partnership/quality contact of credible concerns which may materially affect BIMM students, academic standards, assessment integrity, safeguarding, regulatory compliance or the partnership, in accordance with the partnership agreement.

Notification must identify the concern, immediate safeguards, relevant evidence, proposed investigation arrangements and any urgent decisions required. Share only necessary information securely and assess whether identifying the reporter is necessary. Agree and record responsibility for investigation, communication, student protection and follow-up. Do not delay urgent action while agreeing ownership.

Matters about BIMM personnel or decisions will be referred to an appropriate unconflicted BIMM recipient. NHAM will support access to the applicable BIMM route and cooperate with authorised enquiries. BIMM is not automatically the appeal body for every NHAM employment matter, nor is it presented here as a statutory prescribed person.

Student complaints and academic appeals must retain the NHAM/BIMM stages applicable to the course and partnership agreement, including eligible access to the Office of the Independent Adjudicator after the relevant process. This whistleblowing procedure does not replace those rights. NHAM and BIMM will each assess and discharge their own regulatory notification obligations where applicable.

10 External reporting and independent advice

You may seek confidential advice from a legal adviser, your trade union, Acas or Protect. You do not have to exhaust NHAM's process before making an appropriate external disclosure. Statutory protection depends on the route and legal conditions; for a prescribed person, you must reasonably believe the matter falls within its remit and the information and any allegation are substantially true.

Relevant routes may include the Office for Students for matters within its remit, the Information Commissioner for data protection, and the Health and Safety Executive or appropriate local authority for health and safety. Check the current GOV.UK prescribed-person list. The OfS notifications process does not resolve individual student complaints or guarantee anonymity. Wider disclosures, including to the media, have additional legal conditions; independent advice is strongly recommended.

11 Protection, confidentiality and support

NHAM prohibits retaliation against anyone raising a reasonably held concern or assisting an investigation. This includes dismissal, threats, reduced hours, exclusion, adverse references, unfair assessment, or withholding teaching, support, placements or industry opportunities. Retaliation or obstruction may lead to disciplinary action. Report it promptly to an unconflicted recipient in section 5; it will be assessed separately and protective measures considered.

A concern will not lead to disciplinary action simply because it is mistaken, unsubstantiated, critical of senior staff or inconvenient. “Good faith” is not a condition of statutory whistleblowing protection. Deliberately fabricating evidence or knowingly making false allegations may be addressed through a fair disciplinary process; lack of proof does not establish dishonesty.

NHAM will restrict identity and case information to those who need it. It cannot promise absolute confidentiality: disclosure may be necessary for a fair investigation, safeguarding, legal obligations or proceedings. Where lawful and practicable, NHAM will explain any necessary disclosure beforehand and discuss protective measures. The circumstances themselves may identify a reporter even if their name is withheld.

No confidentiality clause, settlement agreement, instruction or policy may prevent a protected disclosure. This policy does not authorise unlawful access to information or disclosure of legally privileged material. Statutory protection is determined by law, not by NHAM’s classification of a concern.

The case manager will discuss practical support and check for retaliation during and after the case, normally within one and three months of closure where contact is possible. Support may include adjustments, a separate contact person and access to existing staff or student support. Seek prompt independent advice about legal remedies: internal handling does not extend tribunal deadlines, and an application for interim relief following dismissal can have a seven-day deadline.

12 Records, oversight and review

The case manager will maintain a restricted record of the disclosure, risk assessment, conflicts, decisions and reasons, evidence, notifications, communications, findings, review and completed actions. Records will be processed under UK data protection law, with appropriate lawful bases and additional conditions where required for sensitive or criminal-offence data.

Retention will follow NHAM’s approved retention schedule, with a documented purpose and review/deletion date. Preserve relevant records while an investigation, legal hold, regulatory enquiry or proceedings require them. Do not store case details on a general-access drive, routine committee papers or student-facing systems. The risk register should record systemic risks without unnecessary identifying information.

The Governance Committee will receive an anonymised annual report covering concerns, timeliness, themes, outcomes, retaliation and completed improvements. Serious risks will be escalated sooner to unconflicted members. The Chief Executive will maintain training and reporting arrangements; the Committee will review their independence and effectiveness annually, consult staff and recognised unions where applicable, and update this policy following relevant legal or BIMM changes.

Appendix 1 – Advice and reference links

These links support this policy. Use the current version of the relevant procedure and the reporting channel specified by the receiving organisation. Legal references were checked on 21 October 2026.

Independent advice

Acas: https://www.acas.org.uk/whistleblowing-at-work
Protect: https://protect-advice.org.uk/

Child protection failures

NSPCC whistleblowing advice:
https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/

Prescribed people and bodies

https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2

Office for Students notifications

https://www.officeforstudents.org.uk/for-students/understanding-students/notifications/

Core whistleblowing legislation

Employment Rights Act 1996, Part IVA:
https://www.legislation.gov.uk/ukpga/1996/18/part/IVA
Protection from detriment: section 47B; dismissal: section 103A.
Public Interest Disclosure Act 1998:
https://www.legislation.gov.uk/ukpga/1998/23/contents

Sexual harassment amendment

Employment Rights Act 2025, section 23, in force 6 April 2026:
https://www.legislation.gov.uk/ukpga/2025/36/section/23

BIMM safeguarding

Safeguarding Policy, including section 9 (Whistleblowing):
https://www.bimm.ac.uk/document/safeguarding/

BIMM partnership and student procedures

Partner Handbook:
https://www.bimm.ac.uk/document/partner-handbook
Policy directory:
https://www.bimm.university/governance-and-quality/policies-procedures-and-key-documents/
Appeals and complaints:
https://www.bimm.university/appeals-and-complaints/

NHAM linked policies

https://nottinghillacademyofmusic.com/policies-and-procedures-2/

November 2026 implementation review

Prepared on 5 November 2026 for approval. Confirm current role holders, monitored contacts, resources and partner responsibilities before publication. Keep earlier versions and communicate approved changes to affected students and staff.

Maintain an unconflicted governance reporting route, including where the Chief Executive or normal recipient is implicated. Staff and student personal complaints use their appropriate procedures, while a disclosure about wrongdoing is assessed under this policy and applicable protected-disclosure law. Check names, external reporting routes, confidentiality and record retention.