

School of Coding & AI

WHISTLEBLOWING POLICY

1. Introduction

1.1 Purpose

This policy enables staff, volunteers, contractors, and directors of School of Coding & AI (SOC) to raise concerns about wrongdoing, risk, or misconduct in a safe, confidential, and responsible manner. It supports a culture of openness, integrity, and accountability, ensuring that concerns are addressed promptly and appropriately, and that individuals can speak up without fear of reprisal, in accordance with the principles and provisions in the Public Interest Disclosure Act 1998.

The policy complements, but does not replace, SOC's Anti-Bribery and -Counter Fraud Policy and its associated investigation procedure. Concerns relating specifically to fraud, bribery, or irregularity may be raised under either route, but individuals who fear detriment or feel unable to report through normal channels should use this whistleblowing policy.

1.2 Scope

This policy applies to:

- All members of SOC staff (permanent, temporary, fulltime, parttime).
- Volunteers and contractors (paid or unpaid).
- Directors and any associated persons acting on behalf of SOC.

It covers concerns raised in the public interest about suspected wrongdoing by SOC, including but not limited to:

- Fraud, financial irregularities, corruption, bribery, or dishonesty.
- Criminal offences or breaches of legal or regulatory obligations.
- Health and safety risks.
- Miscarriages of justice.
- Serious safeguarding or PREVENT concerns.
- Environmental risks.
- Sexual harassment¹.
- Attempts to conceal or destroy evidence of wrongdoing.

This policy is **not** for personal employment concerns or disputes, which should be raised through the Grievance Procedure. If unsure which route applies, staff should seek advice from the Director of Human Resources.

In applying this policy, SOC will have particular regard to, and place significant weight on, the importance of freedom of speech within the law and academic freedom, and will act in a manner compatible with SOC's Freedom of Speech and Academic Freedom Code of Practice.

2. Whistleblowing Policy Principles

SOC's whistleblowing framework is based on the following principles:

- **Zero tolerance** — SOC will not tolerate fraud, corruption, discrimination, or unethical conduct.
- **Encouragement to speak up** — Individuals are encouraged to raise concerns as early as possible, knowing they will be taken seriously and investigated appropriately.

¹ In accordance with the Employment Rights Act 2025.

- **Culture of safety and openness** — SOC promotes an environment where concerns can be raised without fear of victimisation.
- **Respect for confidentiality** — SOC will protect the identity of whistleblowers wherever possible and appropriate.
- **Protection from detriment** — No individual will suffer dismissal, disciplinary action, or disadvantage for raising a genuine concern, even if it is mistaken.
- **Clear reporting routes** — Concerns may be raised through a member of the Senior Management Team, directly with the Director of Human Resources, or with the Clerk to the Board where necessary.
- **External reporting where justified** — Where internal routes are exhausted or inappropriate, concerns may be raised with prescribed external bodies.
- **Fairness and integrity** — Disciplinary action will only be taken against individuals who knowingly raise false, malicious, or vexatious concerns.
- **Accessible procedure** — The process for raising concerns is simple, transparent, and available to all.

3. Responsibilities

Role holder(s)	Responsibility
All SOC staff, contractors, volunteers, and directors	<ul style="list-style-type: none"> ● Raise concerns promptly and in good faith. ● Provide factual information to support the concern. ● Maintain confidentiality during and after any investigation. ● Cooperate with any investigation.
Members of the Senior Management Team	<ul style="list-style-type: none"> ● Foster a culture where concerns can be raised safely. ● Receive concerns sensitively and escalate them appropriately. ● Ensure staff understand this policy and know how to use it. ● Maintain confidentiality and protect whistleblowers from detriment.
Director of Human Resources	<ul style="list-style-type: none"> ● Conduct investigations and maintain records. ● Refer cases to be dealt with through Staff Disciplinary Procedures if appropriate. ● Prepare proposals to the Senior Management Team for changes to standard operating procedures or policies identified through an investigation. ● Refer agreed policy changes and/or cases where external agencies needed to be notified to the Clerk to the Board. ● Oversee training for staff.
Principal and OfS Accountable Officer	<ul style="list-style-type: none"> ● Notify the OfS of material adverse events (including suspected or actual fraud or financial irregularity).
Clerk to the Board	<ul style="list-style-type: none"> ● Alternative point of contact. ● Conduct investigations and maintain records. ● Refer cases to be dealt with through Staff Disciplinary Procedures if appropriate. ● Refer proposals to the Senior Management Team for changes to standard operating procedures or policies identified through an investigation.

	<ul style="list-style-type: none"> • Identify the approval route of policy changes and/or refer cases where external agencies needed to be notified. • Oversee training for the Board of Directors.
Board of Directors	<ul style="list-style-type: none"> • Ultimate responsibility for ensuring that SOC maintains robust policies relating to misconduct, fraud and bribery prevention, as well as oversight mechanisms. • Annual review of whistleblowing cases to identify themes and confirm that learning is embedded, including outcomes of cases where wrongdoing is found, and remedial action being taken by the executive.

4. Whistleblowing Procedure

SOC encourages individuals to raise concerns openly wherever possible, as this enables a fuller and more effective investigation. Anonymous concerns will be considered, but they may limit the ability to obtain further information, assess credibility, or reach a conclusive outcome. Anyone concerned about reprisals or the disclosure of their identity should discuss this with the Director of Human Resources who will consider appropriate measures to protect confidentiality. Independent advice is also available from [Protect](#), the whistleblowing charity, which offers a confidential helpline.

4.1 Raising a Whistleblowing Concern

In the first instance, concerns can be raised informally with a member of the Senior Management Team, either verbally or in writing. They may be able to resolve the issue promptly or may refer it to the Director of Human Resources for further consideration. If the person raising the concern wishes to remain anonymous, they can email the Clerk to the Board (clerk@schoolofcoding.co.uk).

However, if the individual feels that an informal approach is not appropriate or has not addressed the concern, or does not feel able to raise their concern with a member of the Senior Management Team, then the concern should be reported directly to the Director of Human Resources. If the individual feels unable to approach the Director of Human Resources (for example, if they have a perceived conflict of interest), the alternative contact is the Clerk to the Board (clerk@schoolofcoding.co.uk).

Where, having reviewed the concern, the Director of Human Resources /Clerk decides that it does not provide any evidence of malpractice and/or is wholly without substance or merit, no further action will be taken. Alternatively, the Director of Human Resources/Clerk may decide that the concern does not fall within the scope of this policy but should be considered and progressed as appropriate under a different SOC policy or procedure. The individual raising the concern will be informed of this decision, with reasons, within 10 working days of receipt of the concern.

4.2 Meetings and Support

In all other cases, a meeting will be arranged as soon as reasonably possible to discuss the concern. Individuals may be accompanied by a colleague or trade union representative, who

must maintain confidentiality. Additional meetings may be required to clarify information or support an investigation.

4.3 Investigation of the Concern

Following the meeting, the Director of Human Resources /Clerk will decide whether an investigation is required. If so, the concern will be investigated thoroughly, impartially, and in a timely manner. The scope and method of investigation will depend on the nature of the concern. The individual raising the concern will be kept informed of progress and indicative timescales, which will vary depending on the nature of the concern. All information relating to the investigation must be treated as confidential.

4.4 Outcome of investigation

The Director of Human Resources/Clerk will inform the individual raising the concern of the outcome of the investigation, usually within 5 working days of the conclusion of the investigation. Details of any action taken will be shared, subject to data protection considerations.

4.5 Actions if wrongdoing is found

Where an investigation upholds (in whole or part) the concern, one or more of the following actions will be taken:

- **Internal operational changes or risk reviews, e.g.**
 - Process or control changes (e.g. tightening financial controls, amending procedures).
 - Improvements to training, oversight, governance reporting.
 - Revisiting risk registers and, if necessary, revising risk appetite or mitigations.
- **Referral for action under the relevant disciplinary procedure:**
 - for staff this would be under the Staff Disciplinary Procedures (with sanctions up to and potentially including dismissal);
 - for independent board members the procedure in section 2.4.2 of the SOC Code of Governance would be followed.
- **Regulatory and external reporting:**
 - To the OfS as a “reportable event” if thresholds are met (e.g. fraud, serious governance failure, major quality/financial issues)
 - Depending on the nature of the wrong-doing external agencies may be contacted, e.g. the police, Information Commissioner’s Office, Health and Safety Executive, or the Serious Fraud Office.

4.6 Escalation if Dissatisfied

If, following notification of the outcome of the investigation, the individual believes that their concern has not been properly addressed, they may raise the matter in confidence with the Clerk to the Board, or with the Chair of the Board in cases where the Clerk to the Board investigated the case. This provides an internal route of appeal before considering external disclosure.

The Clerk/Deputy Chair will review the case and will notify the person raising the concern of the outcome within 10 working days.

4.7 Monitoring and reporting

The Board of Directors will receive a report of cases where wrongdoing was found and details of the remedial actions being taken. The Board may request more regular reports on specific matters relevant to the case.

5. External reporting

If a whistleblower believes that appropriate action has not been taken in response to a concern raised under this policy, they may report the matter to the appropriate external authority. There are a number of bodies to which qualifying disclosures may be made (non-exhaustive list):

- Office for Students (OfS)
- United Kingdom Research and Innovation (UKRI)
- HM Revenue and Customs
- Financial Conduct Authority
- Health and Safety Executive
- Environment Agency
- Independent Office for Police Conduct
- Serious Fraud Office
- Office of Fair Trading
- Director of Public Prosecutions
- Action Fraud
- National Crime Agency

It is strongly recommended that whistleblowers seek advice before raising a concern with an external authority.

6. Safeguards

The overall aim of this policy is to ensure that whistleblowers will not suffer detriment or adverse treatment from SOC as a result of raising a concern. The individual concerned will be protected if a concern is raised with the appropriate person as set out in section 4 above. All reasonable steps will be taken to protect whistleblowers from bullying, harassment or reprisals. Any SOC staff member alleged to be involved in such conduct may be subject to disciplinary action.

If an individual discloses information which shows or suggests wrongdoing, but which is not then confirmed by a subsequent investigation, no detrimental or disciplinary action will be taken. However, where an individual is found to have made malicious or vexatious

allegations, particularly if they persist in doing so, action may be taken against them in line with the relevant disciplinary procedure.

Name of provider: School of Coding & AI Ltd
Name of nominated accountable officer: Suki Gill
Designation: Principal

Signature: S. Gill
Date: 18th June 2026