



Whistleblowing Disclosure Policy (Public Interest Disclosure) 2026

1. Introduction

- 1.1 What is a whistleblowing disclosure? A “whistleblowing disclosure” describes the act of reporting wrongdoing within an organisation that affects others in relation to risks to health and safety, criminal offences, or breaches of legal obligations. Although the word itself isn’t defined in UK law, the process it refers to — known legally as a “protected disclosure” — is covered by the Public Interest Disclosure Act 1998. This policy uses “whistleblowing” to refer to that process. The Whistleblowing act is done by a person in good faith and with the reasonable belief that it is in the public interest.
- 1.2 Whistleblowing disclosures tend to show that one or more of the following has occurred, is occurring or is likely to occur:
- a criminal offence (this may include, for example, types of financial impropriety such as fraud)
 - a breach of a legal obligation
 - a miscarriage of justice
 - danger to the health or safety of any individual
 - damage to the environment
 - deliberate covering up of wrongdoing in the above categories
 - sexual harassment.

2. Scope

- 2.1 This policy applies to everyone working with or for LAMDA, regardless of role or contract type. That includes senior managers, directors, trustees, employees, consultants, contractors, part-time and fixed-term staff, casual and agency workers, and volunteers or alumni. For simplicity, all these individuals are referred to as “staff” throughout this policy. It also applies to students studying with LAMDA.
- 2.2 The Public Interest Disclosure Act 1998 provides protection against victimisation or detriment in employment for any staff member who raises a whistleblowing disclosure in good faith and in the reasonable belief that it is in the public interest. Although this specific legislation does not extend to students, LAMDA want to build a culture in which everyone feels confident to raise a concern in relation to whistleblowing disclosures and therefore LAMDA students will receive the same

protection against victimisation or detriment in relation to their studies with LAMDA.

3. Associated Policies

3.1 If your concern relates solely to your own personal treatment at LAMDA, for example, bullying, harassment including sexual harassment, or an issue regarding pay, or a lack of training, then you need to use the applicable staff and student policies to raise your concerns. The table below provides reference to the associated staff and student policies.

Staff	Students
Grievance policy (e.g. staff complaints process for individual concerns, or issues regarding a workplace incl. below policies) Grievance Procedure.pdf Grievance Procedure Flowchart.pdf	Student Complaints policy (e.g. for student complaints about teaching, facilities, staff misconduct or freedom of speech) LAMDA Student Complaints Procedure.pdf LAMDA Student Complaint Form.url
Anti-Harassment and Bullying or Sexual Harassment and Sexual Violence policies (e.g. for staff complaints about bullying, harassment or sexual misconduct in the workplace) Anti-Harassment & Bullying policy.pdf Sexual Harassment and Sexual Violence Policy.pdf	Student Harassment and Sexual Misconduct policy (for student complaints about bullying, harassment or sexual misconduct experienced or committed by staff or by students) Harassment and Sexual Misconduct Policy.pdf
Code of Conduct (sets out the expectations of general staff conduct in the workplace) Code of Conduct.pdf	Student Regulations (sets out the expectations and regulations governing all students) Student Regulations.pdf
	Student Misconduct Policy

	(sets out the procedures for handling all breaches of the student regulations <i>except</i> for academic misconduct, i.e. cheating) <u>Student Misconduct Policy and Procedures.pdf</u>
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3.2 If you have concerns relating to possible financial misconduct or fraud then the Anti-fraud and Anti-bribery policies may apply.

3.3 If you have concerns relating to possible safeguarding issues then the Safeguarding policy and/or Child Protection policy may apply.

4. Anonymous disclosure

4.1 Raising a concern anonymously is better than not raising it at all, but raising it openly is more effective. Anonymous concerns may limit how fully LAMDA can investigate and this could put others at risk. Open concerns allow for thorough investigation and feedback on the outcome and any actions taken. If you are worried about staying anonymous, you can speak with our designated whistleblowing officers, who may be able to help ease your concerns.

4.2 Alternatively you can contact the confidential whistleblowing advice contact line to speak to a Protect Advisor 020 3117 2520.

5. Confidentiality and making a disclosure

5.1 If you raise a concern and want your name kept confidential, we will respect this as much as possible. Sometimes, the investigation may reveal who provided the information, or your identity may need to be shared to resolve the issue. If that happens, we will discuss it with you before moving forward. We also aim to protect the confidentiality of anyone who is the subject of a concern, as far as it is possible.

6. Sources of support

6.1 We do appreciate that it is not always easy to come forward and raise a concern, but speaking up where wrongdoing is suspected is the right thing to do. Doing the right thing is important to LAMDA and by using this policy, you will help us to achieve this.

6.2 You may feel anxious about speaking up, because investigations into wrongdoing can feel difficult and stressful for those who are involved. For support and advice please contact the Director of People and Culture who will guide you through the

process and the available support, they can also help you to gather your thoughts so you can decide what course of action you might wish to take.

- 6.3 Alternatively you may wish to seek advice from the independent charity Protect, who are the leading experts in whistleblowing and provide free confidential advice for individuals who witness serious wrongdoing in the workplace but are unsure how to raise their concerns. They also provide advice and information on whistleblowing law. Protect have a helpful information website protect-advice.org.uk that provides resources, e.g. podcasts and video library that might offer you further support and guidance. Alternatively they have a free, confidential whistleblowing advice contact line should you wish to speak to a Protect Advisor 020 3117 2520.

7. Making a disclosure

- 7.1 If you have a concern about potential wrongdoing in relation to activities referenced at point 1.3 of this policy we hope you will feel able to raise it in the first instance with your manager, or course leader.
- 7.2 You can raise your concerns verbally or in writing. You are asked to try to provide as much information as possible, including:
- the background and reason behind the concern
 - whether the concern has already been raised with anyone else and the response
 - any relevant dates and if applicable names of any witnesses; and
 - where possible how you think the matter might best be resolved.
- 7.3 If you have or could be perceived to have any personal interest in the outcome of this disclosure, it is important that you declare this at the outset.
- 7.4 Any disclosures made under this policy will be treated in a sensitive manner, and where a disclosure has been raised in good faith, with a genuine honest belief that wrongdoing has or is likely to occur, you will receive protection against any form of detriment in your employment or studies with LAMDA. Protections against detriment would mean that you will not be treated less favourably, excluded or victimised because you raised a whistleblowing disclosure. This protection against detriment includes where further enquiries or an investigation subsequently confirms there has been no wrongdoing.
- 7.5 Only if we believe on reasonable grounds that a disclosure has been made as a malicious or vexatious allegation will we take action in relation to the person who made the disclosure. This action would fall under the relevant staff or student misconduct policies and procedures.
- 7.6 Your line manager or course leader will consult with LAMDA's designated whistleblowing officers to take guidance to ensure the correct steps are taken.
- 7.7 If you feel unable to raise the matter with your manager or course leader for whatever reason, then please raise the matter with one of LAMDA's designated whistleblowing officers. LAMDA's designated whistleblowing officers are:
- Director of People and Culture: Claire Bell Claire.bell@lamda.ac.uk and/or
 - Clerk to the Board: Justine Stephenson Justine.stephenson@lamda.ac.uk

- 7.8 Should the matter be related to the designated whistleblowing officer or a matter in which they are involved, then in this instance the disclosure may be made to the Principal and Chief Executive of LAMDA, who shall assume the authority of the designated whistleblowing officer until the conclusion of the matter.
- 7.9 Should the matter be related to or involve the Principal and Chief Executive of LAMDA then the Chair of the Audit Committee shall become the designated whistleblowing officer for the duration of the matter and report to the Chair of the Board.

8. How the disclosure will be handled

- 8.1 The designated whistleblowing officer shall consider the information presented to them and they may take any of the following, or a combination thereof, steps:
- Invite you to meet, or meet again with them, to take further information to help them with their considerations;
 - decide not to proceed with the matter;
 - authorise an initial investigation or if more applicable a review under this policy;
 - refer the matter to another policy within LAMDA; or
 - refer the matter to the relevant authorities.
- 8.2 The seriousness/urgency of the matter will dictate what and how quickly these activities need to happen, but in all cases contact will be made with you within 5 working days of the concern being raised, and explain what the next steps are and why. By way of example, if it is established that the nature of the concern means the matter would be better dealt with using a different route (e.g. another HR policy) this will be explained to you.

9. Investigations under this policy

- 9.1 If the concern is to be dealt with under this policy, the designated whistleblowing officer will need to establish the following:
- If preliminary enquiries need to be made and who will do that;
 - whether to instigate an investigation and
 - who will deal with the investigation i.e. appoint an Investigating Officer (IO).
- 9.2 Investigations will be conducted sensitively and as quickly as possible.
- 9.3 The IO will write to anyone who needs to be interviewed as a witness, as part of the investigation process.
- 9.4 In most cases it should be possible for you to continue to undertake your role or studies as normal whilst a concern is being investigated.
- 9.5 The IO will aim to undertake their work thoroughly and without unnecessary delay. The IO will update you on progress as appropriate, but as a minimum expectation by no later than 28 days.

- 9.6 In the event of an investigation or the involvement of police/security, it may not always be possible or appropriate to provide full details.
- 9.7 Whilst there can be no guarantee that the outcome will be as you may wish, the IO will have worked to handle the matter fairly and properly and will confirm when the matter has been concluded.
- 9.8 They will explain the outcome of the investigation in as much detail as they are able, whilst maintaining security and confidentiality for all parties.
- 9.9 Depending on the circumstances the IO may feedback their conclusion face to face or over the telephone with you, and whenever possible, will give you feedback on the outcome of any investigation. Please note, however, that it may not be possible to tell you the precise actions that have been taken where this would infringe a duty of confidence owed to another person.
- 9.10 The information considered relevant and appropriate for disclosure with the IO's concluding report should always be followed up and confirmed in writing.
- 9.11 The conclusion of this process should bring reassurance that the matter has been properly looked into and where appropriate, that action has been taken to address any wrongdoing, so concerns are put to rest.
- 9.12 The length of time taken to conduct an investigation that is fair and thorough will largely depend upon the nature of the case. Every attempt will be made to complete the work required as quickly as possible. However, it is expected that such investigation will fall within a 40-60 working days period. As noted at 9.5 regular contact and progress updates will be provided.

10. If you are dissatisfied with the outcome

- 10.1 While we cannot guarantee that we will respond to all matters in the way that you might wish, we will strive to handle the matter fairly and properly.
- 10.2 There is no internal review or appeal against any decision reached via this process.
- 10.3 However, if you are dissatisfied about the way in which your disclosure has been handled you may raise it with the designated whistleblowing officer or you may wish to contact the independent charity Protect (formerly Public Concern at Work).

Policy Owner	HR
Policy Updated	01/12/2025
Approved by	
Date approved	
Version	1.0
Review Date	01/12/2028