



GREEN VALLEY ACADEMY

Whistleblowing Policy

Approved: October 2026

DOCUMENT CONTROL

Reference	GVA-12
Policy owner	Chair of the Board of Directors
Approved by	Board of Directors — October 2026
Effective from	05 October 2026
Next review	12 months from approval, or earlier following any material change to the University of Wolverhampton admissions framework
Applies to	All staff, workers, Board members, volunteers, contractors and students of GVA
Linked documents	The standalone Whistleblowing Policy and Student Whistleblowing Policy (operational instruments, with which this policy is aligned); Fraud and Audit Assurance Policy; Safeguarding and Prevent Policy

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1. PURPOSE AND COMMITMENT

- 1.1** GVA depends on the willingness of its people to speak up, and this policy exists so that anyone connected with GVA — staff, workers, Board members, volunteers, contractors and students — can raise a concern about wrongdoing safely, confidentially and without fear of reprisal, knowing that the concern will be investigated properly and that silence procured by fear will never be part of GVA's culture. GVA commits without qualification that a person who raises a genuine concern in good faith will be protected from every form of detriment, even where the concern proves unfounded; that concerns will be investigated impartially and proportionately; and that no settlement agreement, contract or instruction will ever be used to prevent a protected disclosure.

2. WHAT MAY BE RAISED, AND TO WHOM

- 2.1** Concerns within this policy include, without limitation: fraud, bribery, theft or financial impropriety; danger to the health or safety of any person; safeguarding failures; academic malpractice, including the falsification of student records, admissions fraud, or the misrepresentation of any data provided to the University of Wolverhampton or any external body; breach of legal or regulatory obligations; miscarriage of justice; environmental damage; and the deliberate concealment of any of these. Personal grievances about a person's own employment belong to the grievance procedure, and student service complaints to the complaint procedure, but a matter raised through the wrong door shall be redirected, never rejected. The ordinary route is a report to the Principal, in writing or in person; where the concern involves the Principal, or the discloser reasonably doubts the Principal's impartiality, the report goes directly to the Chair of the Board of Directors, whose contact details are published for this purpose; anonymous reports are accepted and assessed on their evidence; and a discloser may at any time approach a prescribed body under the Public Interest Disclosure Act 1998 — including the Office for Students, the Information Commissioner's Office, the Health and Safety Executive or the police — with the same protection as an internal disclosure.

3. HANDLING, PROTECTION AND GOVERNANCE

- 3.1** Every disclosure shall be acknowledged within three working days; assessed promptly; and, where warranted, investigated by a person with no involvement in the matter, externally commissioned where seniority or complexity requires; the discloser shall be told the outcome in principle, normally within twenty working days, so far as confidentiality allows. Retaliation against a disclosure, or pressure on any person to withdraw a concern, is itself gross misconduct; confidentiality is protected so far as the law and a fair investigation permit; and records of disclosures are held securely by the Chair, who reports annually to the Board of Directors on the number, nature and outcomes of disclosures and on any pattern requiring systemic action, with matters touching fraud, public funds or significant risk also reported to the Audit and Risk Committee. The operational routes for staff and students are set out in GVA's standalone Whistleblowing Policy and Student Whistleblowing Policy, which are aligned with this policy and shall be read subject to it. Reviewed annually by the Board of Directors.