



“Enabling Students to Accomplish their Academic Goal”

Whistleblowing and Public Concern Policy

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1. Introduction

Bellmont College maintains a culture of integrity, openness, accountability and public trust across its academic, professional services and governance activities. Effective whistleblowing and public concern arrangements support good governance, safeguarding, quality assurance, student protection, financial stewardship and confidence in higher education.

This policy provides a clear and supportive framework for raising concerns about wrongdoing, serious risk, malpractice, maladministration, safeguarding failure, regulatory non-compliance, financial irregularity, unethical conduct or attempts to conceal such matters. Belmont College assesses, investigates and resolves concerns fairly, confidentially and proportionately.

Bellmont College currently works with Liverpool Hope University and is seeking Office for Students approval for its own funding arrangements. Under the current partnership, Belmont College recruits students onto Liverpool Hope University degree pathways and delivers teaching and local support through staff approved within the partnership framework. Liverpool Hope University retains responsibilities for its awards, academic regulations and relevant student routes where these apply to partnership students.

Future regulatory, partnership or funding developments may result in changes to Belmont College's arrangements. Belmont College manages any such change transparently and responsibly, with student interests, academic standards, continuity of study, lawful governance and access to accurate information remaining central to decision-making.

This policy is read alongside Belmont College's wider quality, governance, safeguarding, complaints, equality, data protection, risk management and student protection arrangements, including (*QGP1 Belmont College Quality Assurance Handbook*) and (*QGP2 Belmont College Management, Committee Structure, Organogram and Terms of Reference*).

2. Purpose of the Policy

The purpose of this policy is to establish a clear institutional process through which Belmont College receives, records, triages, investigates, monitors and resolves whistleblowing concerns and public interest disclosures. It explains who may raise a concern, how a concern is raised, how Belmont College responds, and how Belmont College protects people who raise genuine concerns.

The policy supports a speak-up culture in which staff, students, applicants, partners and other stakeholders can raise concerns without fear of retaliation. It also protects the rights of individuals who may be the subject of allegations by requiring fair assessment, proportionate investigation and evidence-based outcomes.

Public interest concerns are not treated as isolated operational issues. Belmont College records and monitors serious or recurring concerns, escalates them through the appropriate committees, and uses the learning to strengthen governance, quality assurance, student support, safeguarding and institutional control.

3. Scope of the Policy

This policy applies to all staff, Directors, committee members, contractors, consultants, agency workers, associate lecturers, visiting lecturers, volunteers,

student representatives, students, applicants, placement or partner representatives and individuals acting on behalf of Belmont College.

Statutory whistleblowing protection applies to workers as defined by law. Belmont College also enables students, applicants and external stakeholders to raise public concern matters and protects them from unfair treatment wherever this is within Belmont College's control.

The policy applies to governance, finance, procurement, admissions, public information, teaching and learning, assessment, academic integrity, student support, safeguarding, PREVENT, equality and diversity, harassment and sexual misconduct, data protection, health and safety, quality assurance, partnership activity, digital systems and institutional decision-making.

Where a concern relates to Liverpool Hope University partnership provision, Belmont College coordinates with Liverpool Hope University as appropriate while continuing to support individuals locally and protect student interests. Relevant partner arrangements may include (*LHU Liverpool Hope University Academic Regulations*), (*LHU Liverpool Hope University Student Contract*) and (*LHU Liverpool Hope University Student and Apprentice Complaints Policy and Procedure*).

4. Regulatory and Legal Framework

This consolidated framework applies across the whole policy. It informs how Belmont College receives, investigates, escalates and learns from concerns.

Requirement	Relevance to this policy
Public Interest Disclosure Act 1998 and Employment Rights Act 1996	Protected disclosures by workers and protection from dismissal or detriment.
Office for Students Conditions of Registration	Quality, student support, assessment, consumer protection, student protection, governance, reporting and funding controls where applicable.
Competition and Markets Authority expectations	Clear information, fair terms and accessible complaints processes for students and applicants.
UK Quality Code for Higher Education	Academic standards, quality, student engagement and continuous enhancement.
UK GDPR and Data Protection Act 2018	Lawful, fair, transparent and secure processing of disclosure and investigation records.
Equality Act 2010	Fair, accessible and non-discriminatory processes and protection from victimisation.
Health and Safety at Work etc. Act 1974	Reporting and management of serious health, safety and welfare risks.
Counter-Terrorism and Security Act 2015 and PREVENT guidance	Escalation of radicalisation, extremist-influence or safeguarding concerns.
Fraud Act 2006, Bribery Act 2010 and financial governance requirements	Fraud, bribery, corruption, misuse of resources and concealment of wrongdoing.

Office of the Independent Adjudicator Good Practice Framework	Fair handling where concerns overlap with individual student complaints or appeals.
Liverpool Hope University partnership requirements	Partnership responsibilities where concerns affect awards, regulations, complaints, safeguarding or shared responsibilities.

5. Definitions and Types of Public Interest Concerns

A whistleblowing concern is a concern about suspected wrongdoing, serious risk or failure that is in the public interest rather than a private employment or personal dispute. The concern may relate to something that has happened, is happening, is likely to happen, or is being concealed.

A protected disclosure is a legal concept under the Public Interest Disclosure Act 1998 and the Employment Rights Act 1996. A disclosure may be protected where a worker reasonably believes that it is made in the public interest and that it tends to show a criminal offence, breach of a legal obligation, miscarriage of justice, danger to health and safety, environmental damage, or concealment of any such matter.

A public concern is a concern raised by any person where the issue may affect students, staff, the public, public funds, academic standards, safeguarding, regulatory compliance, operational integrity or institutional accountability, even where the person raising the concern is not covered by statutory whistleblowing legislation.

Examples of concerns that may fall within this policy include:

- fraud, bribery, corruption, theft, financial irregularity or misuse of public or institutional funds;
- failure to comply with legal, regulatory, awarding body or partnership obligations;
- malpractice, maladministration or deliberate concealment of errors affecting students or public accountability;
- safeguarding failures, PREVENT concerns, harassment, sexual misconduct, discrimination or abuse of authority;
- serious health and safety risks or failure to manage risks to students, staff, visitors or the public;
- academic integrity concerns, assessment manipulation, falsification of records or improper influence over academic decisions;
- misleading public information, unfair terms, improper student recruitment activity or failure to treat students fairly;
- data protection breaches, cybersecurity concerns or inappropriate disclosure of confidential information; and
- attempts to suppress, conceal or retaliate against someone for raising a genuine concern.

6. Core Principles

Bellmont College's approach is based on openness, accountability, confidentiality, fairness, proportionality, evidence-based decision-making and protection from

victimisation. Belmont College takes genuine concerns seriously, even where a concern is later found to be mistaken.

Bellmont College protects individuals who raise genuine concerns from victimisation, retaliation, intimidation or unfair treatment. Belmont College also protects the rights of individuals who are the subject of allegations by ensuring that concerns are assessed and investigated fairly, objectively and confidentially.

Bellmont College normally seeks to resolve concerns internally where this is appropriate and lawful. Some concerns require safeguarding referral, partner liaison, regulatory notification, legal advice, law enforcement referral or independent investigation. Decisions are made in proportion to the seriousness, evidence and risk presented by the concern.

7. How this Policy Protects Students, Staff and Institutional Integrity

The table below explains how the policy operates across the student and institutional journey and identifies the committee routes used to support implementation and monitoring.

Area	What this policy protects	Implementation route
Recruitment, admissions and public information	Concerns about misleading course information, unfair admissions practice, conflicts of interest, fraudulent documents or improper recruitment activity are assessed and investigated.	Recruitment, Admissions and Registry Committee; Quality Committee; Senior Management Committee. Records include admissions, verification, public information review and action logs. (<i>RAP1 Belmont College Recruitment, Selection and Admission Policy</i>).
Enrolment, contract and student information	Concerns about unfair terms, inaccurate fee information, unclear student rights or inaccessible information are escalated for review and corrective action.	Quality Committee; Senior Management Committee. Records include student contract information, induction information, published information checks and corrective action logs. (<i>RAP2 Belmont College Student Contract 2025-26</i>).
Teaching, learning and assessment	Concerns about assessment integrity, unfair influence, falsified records, academic misconduct or non-delivery of advertised academic support are reviewed through academic governance.	Academic Committee; Quality Committee; Learning and Teaching Committee. Records include module evaluation outcomes, moderation records, academic integrity records and enhancement plans. (<i>LTP6 Belmont College Academic Integrity and Misconduct Policy</i>).

Student engagement, support and wellbeing	Concerns about disengagement, support gaps, safeguarding, PREVENT, harassment, sexual misconduct, wellbeing or barriers to participation are escalated promptly.	Student Staff Committee; safeguarding and PREVENT arrangements; Senior Management Committee. Records include feedback, support referrals, safeguarding logs and action tracking. (<i>HSP1 Belmont College Safeguarding and PREVENT Policy</i>).
Complaints, appeals and redress	Where the matter is a personal complaint or academic appeal it is routed through the relevant procedure; where it raises a public interest issue it is managed under this policy or alongside the appropriate procedure.	Quality Committee; Academic Committee; Senior Management Committee. Records include complaint and appeal records, outcomes, trend analysis and escalation records. (<i>CAP3 Belmont College Complaint and Appeal Policy and Procedure</i>).
Governance, risk and student protection	Concerns about governance failure, risk escalation, continuity of study, misuse of funds, breach of conditions or serious institutional risk are reported through governance.	Board of Directors; Audit and Risk Committee; Senior Management Committee. Records include risk register entries, committee minutes, Board reports, business continuity records and student protection actions. (<i>BCP1 Belmont College Risk Management Policy</i>); (<i>CAP1 Belmont College Student Protection Plan and Policy</i>).

8. What this Policy Covers and What it Does Not Cover

This policy covers concerns raised in the public interest, including concerns about wrongdoing, serious risk, concealment or institutional failure. It does not replace normal routes for individual complaints, academic appeals, staff grievances, disciplinary matters or routine operational feedback.

A concern raised through another procedure may include a whistleblowing or public interest issue. When this happens, Belmont College cross-refers or manages the matter through the most appropriate process while preserving confidentiality and fairness.

Student complaints about teaching, academic support, administration, services or individual treatment are normally considered under (*CAP3 Belmont College Complaint and Appeal Policy and Procedure*). Concerns about assessment outcomes or academic decisions may be considered through the relevant academic appeal route. Serious concerns about wrongdoing, concealment, public safety, safeguarding, fraud, regulatory breach or maladministration may also fall within this policy.

Bellmont College does not reject a concern simply because the person raising it has a personal interest in the issue. The key question is whether the matter also raises a genuine public interest or institutional integrity issue requiring action under this policy.

9. Raising a Concern

Bellmont College encourages concerns to be raised as early as possible so that risks can be assessed, harm can be prevented and appropriate action can be taken. Concerns may be raised verbally or in writing. Written concerns are usually preferable because they help ensure that the issue, evidence and requested action are recorded accurately.

A concern may normally be raised with a line manager, the Head of Quality and Operations, the Head of Professional Services, the Head of Academic Programmes, the Designated Safeguarding Lead, the Chief Executive Officer, the Chair of the Board of Directors or another appropriate senior officer. Where the concern involves one of these individuals, the concern is raised with an alternative senior person who is independent of the matter.

The person raising the concern provides as much information as possible, including what happened, when it happened, who was involved, who may be affected, what evidence may exist, whether the matter has already been raised, whether there is an urgent risk, and whether safeguarding, health and safety, data protection, fraud or student protection implications are present. Individuals are not expected to prove the concern before raising it; they are expected to act honestly and provide information they reasonably believe to be accurate.

10. Confidentiality, Anonymous Concerns and Data Protection

Bellmont College handles whistleblowing and public concern information sensitively and confidentially. The identity of a person raising a concern is shared only where there is a legitimate need to know, where disclosure is required by law, where safeguarding or regulatory obligations apply, or where disclosure is necessary to carry out a fair investigation.

Anonymous concerns are considered, particularly where they contain enough detail to allow assessment or investigation. Anonymity can make it harder to clarify information, protect the person raising the concern, provide feedback or investigate fully, but Bellmont College does not dismiss a serious concern solely because it has been raised anonymously.

Information relating to disclosures, investigations, safeguarding referrals, student records, employment records and partnership communications is processed in accordance with UK GDPR, the Data Protection Act 2018 and (*BCP5 Bellmont College General Data Protection & Regulation (GDPR) Policy*). Records are stored securely, accessed only by authorised individuals and retained in accordance with relevant retention requirements.

11. Protection from Victimisation and Support for Individuals

Bellmont College does not tolerate victimisation, retaliation, intimidation, harassment, detriment or unfair treatment against any person who raises a genuine concern in good faith. This protection applies to staff and, within Bellmont College's control, to students, applicants, witnesses and others who support an investigation.

Retaliation may include dismissal, demotion, disciplinary action, threats, exclusion, unfair assessment treatment, withdrawal of opportunities, adverse timetable or workload decisions, harassment, bullying, academic disadvantage, refusal of support or pressure to withdraw a concern.

Where retaliation is alleged, Belmont College investigates and takes action where necessary. Action may include safeguarding measures, management intervention, disciplinary action, changes to reporting lines, academic support, adjustments to study arrangements or referral under (*HSP1 Belmont College Safeguarding and PREVENT Policy*). A malicious or deliberately false allegation may be considered under an appropriate procedure; however, no action is taken simply because a genuine concern is mistaken or cannot be substantiated.

12. Initial Review, Triage and Investigation Procedures

When a concern is received, Belmont College carries out an initial review to determine the nature, seriousness, urgency and appropriate route for the matter. The review considers whether this policy applies, whether another procedure is more appropriate, whether immediate risk action is needed, whether Liverpool Hope University or another partner needs to be notified, and whether independent investigation is required.

Bellmont College appoints an appropriate investigator or review officer who is sufficiently independent of the concern. Investigations may include review of documents, emails, student records, financial records, committee papers, digital evidence, interviews, witness statements, complaints data, assessment records, safeguarding information or partner correspondence. The scope and depth of investigation is proportionate to risk, seriousness and complexity.

Individuals who are the subject of concerns are normally told the substance of the allegation and given a fair opportunity to respond, unless there are lawful reasons to delay notification, such as safeguarding risk, risk of evidence being destroyed, police involvement, regulatory advice or other exceptional circumstances. All parties maintain confidentiality during the investigation.

13. Outcomes, Corrective Action and Learning from Concerns

At the conclusion of a review or investigation, Belmont College determines whether the concern is substantiated, partially substantiated, unsubstantiated or more appropriately handled under another procedure. Belmont College communicates outcomes to relevant individuals as far as appropriate, while respecting confidentiality, data protection, employment rights, student privacy and safeguarding requirements.

Outcomes may include no further action, informal resolution, corrective action, policy change, staff training, student support measures, safeguarding referral, disciplinary action, complaint response, academic review, quality assurance action, risk register update, regulatory notification, partner notification, or referral to an external authority.

Learning from concerns is used to improve practice. Action plans are monitored through the relevant committee route until closed, and recurring themes are considered through quality assurance, risk management, student experience, safeguarding, academic governance or professional services reporting.

14. Safeguarding, Harassment, PREVENT and Student Protection

Bellmont College treats safeguarding, harassment, sexual misconduct, PREVENT and student protection concerns as priority matters. If a concern indicates immediate risk of harm, Belmont College takes prompt protective action and refers the matter to the Designated Safeguarding Lead, senior management, external safeguarding agencies, emergency services or Liverpool Hope University where responsibilities overlap.

Concerns involving harassment or sexual misconduct are handled sensitively, with attention to the safety and dignity of reporting parties, witnesses and those subject to allegations. Belmont College considers interim measures, support arrangements and confidentiality requirements at the earliest stage.

Where a concern raises a material risk to continuity of study, continuation, completion, student transfer, teach-out, refunds or compensation, Belmont College considers the matter under (*CAP1 Belmont College Student Protection Plan and Policy*) and escalates it through governance. The aim is to protect students and maintain academic standards during any change or disruption.

15. Collaborative Provision and Liverpool Hope University Arrangements

Bellmont College works with Liverpool Hope University under partnership arrangements for relevant higher education provision. Liverpool Hope University publishes Academic Regulations that set out formal rules governing University courses, programme regulations, assessment and examining arrangements. Where those rules apply to partnership students, Belmont College follows the relevant Liverpool Hope University requirements while maintaining local support and operational oversight.

Liverpool Hope University's public student information includes student contract information, student policies and procedures, academic misconduct and appeals information, and complaints routes. Belmont College uses this information to ensure partnership students are signposted clearly to the correct route when a concern concerns Liverpool Hope University responsibilities, an academic decision, an assessment board, an award requirement or a University service.

Bellmont College also maintains its own local governance, support, safeguarding and quality assurance responsibilities. Concerns that affect teaching delivery, student support, local staffing, local records, public information or Belmont College operations are managed by Belmont College through this policy and relevant committees. Where a concern affects shared responsibilities, Belmont College liaises with Liverpool Hope University through the appropriate partnership route.

The partnership interface is managed without weakening student protection. Belmont College continues to provide local advice, support and escalation, and Belmont College keeps students informed about which procedure applies where this can be shared lawfully and appropriately.

16. External Disclosures, Prescribed Persons and Regulatory Notifications

Bellmont College encourages concerns to be raised internally where this is appropriate because this normally enables prompt investigation, student protection and corrective action. The law also recognises circumstances in which protected disclosures may be made externally, including to prescribed persons or bodies, where the statutory requirements are met.

Individuals considering external disclosure may seek independent advice from a trade union, professional adviser, legal adviser, Acas or a specialist whistleblowing advice service. This policy does not prevent any person from making a protected disclosure in accordance with the law, reporting a crime, making a safeguarding referral, contacting a regulator or cooperating with a lawful investigation.

Where a concern indicates a potential breach of conditions, misuse of funding, serious safeguarding risk, fraud, material student protection issue or partnership risk, Belmont College considers whether notification to Liverpool Hope University, the Office for Students, the Office of the Independent Adjudicator, law enforcement, a safeguarding authority, a funding body, an insurer, an auditor or another relevant body is required. Senior leaders and the Board of Directors make these decisions with legal or specialist advice where needed.

17. Equality, Accessibility and Procedural Fairness

Bellmont College implements this policy fairly, consistently and without discrimination. Belmont College recognises that people may experience whistleblowing processes differently because of disability, health, language, culture, caring responsibilities, immigration status, previous trauma, power imbalance, employment status, financial dependence or personal circumstances.

Reasonable adjustments are considered for those who need them, including adjustments to meetings, communication methods, evidence submission, support arrangements or timelines. Such adjustments are made in accordance with (*SWP2 Belmont College Equality, Diversity and Inclusion Policy*).

Bellmont College applies procedural fairness to all parties. The person raising the concern, witnesses, students affected by the concern and individuals who are subject to allegations are treated with dignity, respect and sensitivity. Decisions are based on evidence and avoid bias, assumptions, retaliation or conflict of interest.

18. Governance and Committee Oversight

Whistleblowing and public concern arrangements are implemented through Belmont College's governance and committee structure. Oversight follows the Quality Handbook governance model, with the Board of Directors holding ultimate governance oversight and the Academic Committee and Audit and Risk Committee providing academic and risk assurance. (*QGP1 Belmont College Quality Assurance Handbook; QGP2 Belmont College Management, Committee Structure, Organogram and Terms of Reference*)

Operational matters are managed through the relevant senior manager and the Senior Management Committee. Academic quality, assessment integrity and student outcomes matters are reported through the Quality Committee and Academic Committee. Risk, fraud, data protection, safeguarding and high-risk concerns are escalated to the Audit and Risk Committee and the Board of Directors where required.

The policy is reviewed annually, or earlier where legislation, regulatory requirements, partnership arrangements, funding arrangements, serious incidents or committee learning indicate that review is needed.

Committee / Body	Governance and oversight role
Board of Directors	Governing body with ultimate oversight of public interest governance, serious concerns, strategic risk, student protection, regulatory compliance and institutional performance.
Audit and Risk Committee	Advises the Board of Directors on audit arrangements, internal control, risk management, financial sustainability, regulatory compliance and assurance over serious or systemic whistleblowing concerns.
Academic Committee	Acts as the academic authority and oversees academic assurance where concerns affect academic standards, quality, assessment, awards, student outcomes or partnership academic responsibilities.
Quality Committee	Subcommittee of the Academic Committee responsible for quality assurance, enhancement, student outcomes, assessment standards and academic quality risk monitoring.
Learning and Teaching Committee	Considers concerns affecting teaching, learning, assessment, feedback, academic support, learning resources and digital learning environments.
Recruitment, Admissions and Registry Committee	Monitors admissions integrity, registry accuracy, student records, enrolment, verification, data quality and recruitment concerns.
Student Staff Committee	Provides a student-facing route for feedback and concerns about the student experience, communication, support, fairness, safety and operational issues.
Senior Management Committee	Operational management forum responsible for coordinating responses, resourcing, investigation oversight, corrective action and escalation to academic, risk or Board routes.
Safeguarding and PREVENT arrangements	Triage and escalate safeguarding, PREVENT, harassment, sexual misconduct, wellbeing and vulnerable student concerns.

19. Roles and Responsibilities

Role	Responsibilities
Board of Directors	Governing body with ultimate oversight of whistleblowing and public concern arrangements, public interest governance, student protection, regulatory compliance, risk and institutional performance.
Chair of the Board of Directors	Provides an independent governance route where concerns involve the Chief Executive Officer, senior leadership or serious governance matters.
Chief Executive Officer	Holds executive accountability for ensuring that concerns are taken seriously, investigations are resourced, corrective

	actions are implemented and reporting reaches the Board of Directors where appropriate.
Head of Quality and Operations	Leads the quality assurance framework, coordinates policy implementation, investigation records, committee reporting, regulatory alignment and learning from concerns.
Head of Professional Services	Oversees professional services concerns connected with recruitment, admissions, registry, student support, communications and professional services processes.
Head of Academic Programmes	Provides academic leadership for concerns connected with teaching, assessment, academic integrity, learning resources, student outcomes and academic support.
Designated Safeguarding Lead and Safeguarding Team	Lead safeguarding triage and escalation where concerns involve harm, abuse, PREVENT, harassment, sexual misconduct or welfare risk.
Managers and Committee Chairs	Receive concerns appropriately, maintain confidentiality, manage conflicts of interest, escalate risks and ensure decisions are recorded.
All staff and representatives	Raise genuine concerns promptly, cooperate with investigations, protect confidentiality and avoid retaliation against those raising concerns.
Students, applicants and third parties	May raise public concern matters where they reasonably believe wrongdoing, harm or serious institutional risk exists. They provide accurate information and engage respectfully with review processes.

20. Training, Communication and Monitoring

Bellmont College provides proportionate training and guidance so that staff understand how to recognise, receive, escalate and manage whistleblowing and public concern matters. Training is appropriate to the role and may include whistleblowing awareness, safeguarding, PREVENT, harassment and sexual misconduct reporting, data protection, complaints handling, academic integrity, financial controls, conflict of interest management and investigation skills.

Bellmont College communicates reporting routes through staff induction, student induction, student-facing information, committee guidance and policy signposting. Students and staff know where to go if they have a serious concern and understand that Belmont College does not tolerate retaliation for genuine reporting.

Implementation records include concern logs, investigation records, safeguarding referrals, committee minutes, Board reports, risk register entries, training records, action plans, policy review records and partner communications where relevant.

21. Conclusion

Bellmont College is committed to maintaining a culture of openness, integrity, accountability and public trust. Effective whistleblowing and public concern

arrangements protect students, staff, public funds, academic standards, safeguarding responsibilities and institutional reputation.

Through this policy, Belmont College provides safe and accessible routes for raising concerns, protects people who raise genuine concerns in good faith, investigates matters fairly and proportionately, acts on evidence, monitors corrective action and uses learning from concerns to improve governance, quality assurance and student protection.

Bellmont College continues to work collaboratively with Liverpool Hope University where partnership arrangements apply. Belmont College manages future regulatory, funding or governance developments transparently and responsibly, and student interests, academic standards, lawful governance, safeguarding and institutional integrity remain central to decisions.

Bellmont College Whistleblowing and Public Concern Policy					
Version	Date	Author(s)	Amendments	Approved by	Next review
1	March 2023	Head of Quality and Operations	New document	Board of Governors	February 2024
2	February 2024	Head of Quality and Operations	Revised; no update or changes made	Board of Governors	October 2024
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