

WHISTLEBLOWING POLICY

CATEGORY	HR
POLICY OWNER	Director of Operations & Sustainability Vice Principal - Student Life
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APPROVED BY	Principal
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1. Policy Purpose

UWC Atlantic's (the College) policy on whistleblowing is intended to demonstrate that the College:

- Will not tolerate malpractice;
- Respects the confidentiality of staff raising concerns and will provide procedures to maintain confidentiality so far as is consistent with progressing the issues effectively;
- Will provide the opportunity to raise concerns outside of the normal line management structure where this is appropriate;
- Will invoke the College's disciplinary policy and procedure in the case of false, malicious, vexatious or frivolous allegations;
- Will provide a clear and simple procedure for raising concerns, which is accessible to all members of staff.
- Will ensure appropriate investigation and action is taken for concerns raised.

The aim of this Policy is to encourage employees and others who have serious concerns about any aspect of the College's work to come forward and voice those concerns.

2. Policy Statement

In this policy '**Whistleblowing**' means the confidential reporting by employees of suspected misconduct, fraud, other illegal acts or unethical conduct by employees or governors of UWC Atlantic.

The College has adopted this policy and the accompanying procedure on whistleblowing to enable staff to report incidents internally, and, if necessary, for such concerns to be raised outside the organisation.

3. Policy Implementation

3.1 Procedure

This procedure is separate from the College's adopted procedures regarding grievances. Employees should not use the whistleblowing procedure to raise grievances about their personal employment situation.

This procedure is to enable members of staff to express a legitimate concern regarding suspected malpractice within the College.

Malpractice is not easily defined; however, it includes allegations of failure to safeguard children or act appropriately in relation to students, fraud, financial irregularities, corruption, bribery, dishonesty, acting contrary to the staff code of ethics, criminal activities, or failing to comply with a legal obligation, a miscarriage of justice, or creating or ignoring a serious risk to health, safety or the environment.

3.2 Confidentiality

Employees or governors who wish to raise a concern under this procedure are entitled to have the matter treated confidentially and their name will not be disclosed to the person or persons alleged to have undertaken the malpractice without their prior approval. It may be appropriate to preserve confidentiality that concerns are raised orally rather than in writing, although members of staff are encouraged to express their concern in writing wherever possible. If there is evidence of criminal activity then the Police will in all cases be informed.

3.3 The Investigation

A member of staff or governor will be at liberty to express their concern to a member of the College Leadership team which consists of the Principal, the Vice Principal Academics, the Vice Principal Student Life, Safeguarding (DSP) Wellbeing & Belonging, the Director of Operations & Sustainability, the Director of Finance, the Director of Philanthropy, Engagement and Partnerships, the Vice Principal Learning & Innovation and the Head of Human Resources.

Should the matter relate to malpractice by a member of the leadership team or be something that the member of staff or governor does not feel comfortable in reporting to the leadership team due to the specific circumstances or, that the matter might not be investigated appropriately then the member of staff may report at liberty to the Vice Chair of Governors (Ruth Rawling - ruth.rawling@uwcatlantic.org).

Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued. The member of staff or governor raising the concern will be kept informed of progress and, whenever possible and subject to third party rights, will be informed of the Resolution.

A member of staff or governor who is not satisfied that their concern is being properly dealt with will have a right to raise it in confidence with the Vice Chair of Governors.

3.4 External Procedures

Where all internal procedures have been exhausted, and where a member of staff feels the concern needs further escalation; It should be noted that under the Public Interest Disclosure Act 1998, there are circumstances where a member of staff may be entitled to raise a concern directly with an external body where the employee reasonably believes:

- That exceptionally serious circumstances justify it;
- That the College would conceal or destroy the relevant evidence;
- Where they believe they would be victimised by the College;
- Where the Secretary of State has ordered it.

External parties might include, the Police, The local safeguarding authorities, trade unions or any other external regulatory body as appropriate to the nature of the concern.

3.5 Malicious Accusations

False, malicious, vexatious or frivolous accusations will be dealt with under the College's Disciplinary Procedure.

3.6 Protection from Reprisal or Victimisation

No member of the staff will suffer a detriment or be disciplined for raising a genuine and legitimate concern, providing that they do so in good faith and follow the Whistleblower Procedures.

4. Related Information

4.1 Independent Advice

Employees can seek independent advice through the charity Protect. They may be contacted by telephone, or through a form on their website:

Telephone: 020 3117 2520

Website: [Protect - Speak up stop harm \(protect-advice.org.uk\)](https://protect-advice.org.uk).

Employees can also share concerns with Care Inspectorate Wales:

CIW National Office
Welsh Government Office
Rhydycar Business Park
Merthyr Tydfil CF48 1UZ

Telephone: 0300 790 0126

Website: ciw.merthyr@gov.wales

5. Policy Measurement and Reporting

The Whistleblowing Policy is reviewed annually by the Human Resources Committee of the Board and the Head of Human Resources as part of the annual review cycle and as part of the whole College development plan. Part of this review process will consider to what extent the policy is being used as an active working document.

The policy is communicated to the school community electronically on **Every** and is available on the UWCA website.