



## Whistle Blowing Policy

**Reviewed February 2023**

**Next review: February 2024**

- A. Confidential Reporting Code
- B. Explanation of Code
- C. Procedures
- D. The School's Response "Whistle Blowing Policy"

### A. Confidential Reporting Code

School is determined to ensure that its employees provide the best standards of service and act properly. This code is designed to give employees the chance to draw attention to concerns about wrong or unacceptable practice. It is not about telling tales on colleagues but aims to ensure that work is carried out honestly and well. This policy provides protection for individuals who disclose malpractice and wrongdoing. All concerns will be recorded and investigated promptly. Concerns will, so far as is possible, remain confidential and those raising them will be treated fairly by the School. Reports will be prepared, following investigation and appropriate action will be taken to resolve concerns.

### B. Explanation of Code

1. The sorts of issues covered by the code include:

- (a) any unlawful act;
- (b) breaches of School policy, codes of practice, failure to comply with professional standards and acceptable standards of behaviour including forming inappropriate relationships with students;
- (c) misuse of assets;
- (d) actions which could harm people;
- (e) significant damage to property;
- (f) abuses of position, power or authority including forming inappropriate relationships with students;
- (g) unfair discrimination, and
- (h) fraud, corruption or dishonesty;
- (i) loss of income to the school;
- (j) other unethical conduct.

2. This code is meant to add to existing procedures (e.g. for dealing with grievances). It should only be used where employees reporting concerns feel that other procedures cannot be used.



3. In many cases it is the School employees who are best placed to know of any concerns about wrong or unacceptable practice within the School and to identify matters which fall short of what the School expects. The School therefore expects employees to report their concerns and will treat failure to do so as a serious matter. The earlier you express the concern the easier it is to take appropriate action.

4. Although you are not expected to prove beyond doubt the truth of a concern, you will need to demonstrate to the person contacted that there are reasonable grounds for your concern. The School recognises the potential vulnerability of employees who express concerns under this procedure and will not tolerate any attempt to harass or victimise such a person.

5. Where a concern is found to be malicious or has been made in bad faith, this will be regarded as a serious matter and could lead to disciplinary action.

6. (a) This code encourages you to put your name to your concern whenever possible.

(b) Concerns expressed anonymously are much less powerful but will be considered at the discretion of the School.

(c) In exercising this discretion the factors to be taken into account would include: - the seriousness of the issues raised - the credibility of the concern, and - the likelihood of confirming the concern from attributable sources.

## C. Procedures

A member of School Academic Management will normally be the first point of contact. They will be responsible for initiating investigations to concerns promptly: Andrew Flint Principal, Tony Revill Director of Studies. If employees feel that a member of the Academic Management Team may be involved in the matter about which they are concerned, the MD, Tammy Gill should be the person informed of the concern. If employees feel that the MD may be involved in the matter about which they are concerned, the Academic Management Team should be informed of the concern.

1. The person receiving the concern will:

(a) record it;

(b) ensure confidentiality, so far as may be possible in dealing properly with it;

(c) investigate promptly and respond to the employee concerned, under section D. below.

(d) recommend appropriate action to resolve the concern.

2. It is desirable for those raising concerns to give the person charged with investigating them all relevant facts and the reasons for concern.

3. Although employees are not expected to prove the truth of any allegation, they will need to demonstrate sufficient and genuine grounds for concern.

## D. The School's Response



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1. Initial enquiries will be made to decide what investigation will be appropriate. Concerns which come within the scope of existing procedures (e.g. child protection issues) will normally be considered under those procedures.
2. Some concerns may be resolved by agreed action without the need for investigation.
3. Within 10 working days of a concern being received the School will, in writing -
  - (a) acknowledge receipt of the concern;
  - (b) indicate how it proposes to deal with it;
  - (c) give an estimate of how long it will take to provide a final response;
  - (d) state whether any inquiries have been made,
  - and (e) state whether any further investigations will take place, and if not, why not.
4. If necessary, further information will be sought from the person raising the concern.
5. If a meeting is arranged between the person responsible for dealing with the concern under this procedure and the employee raising it, then the employee has the right to be accompanied by a colleague who is not involved in the area of work to which the concern relates.
6. The School will confirm in writing to those raising concerns that they have been properly dealt with. Information about outcomes of investigations will be given unless this is not possible for legal reasons.
7. Employees must at all times observe the guidelines set out in the School and Council's Code of Conduct.