



## Whistleblowing Policy

### 1. Introduction

St Antony's College is committed to conducting its business with the highest standards of integrity and honesty at all times, and everyone working at the College is expected to maintain the same standards in everything they do. The College encourages open communication and aims to ensure that any concerns are dealt with promptly and appropriately. We have a number of policies and procedures in place to address problems that may arise for our staff, including those relating to grievance, harassment and discipline.

Where there are genuine concerns about possible wrongdoing that are not adequately covered by other College policies or procedures, employees, students, and other members of the College are strongly encouraged to make a disclosure under this policy.

This policy aims to assist any member of the College to report serious concerns without fear of retribution, and to provide a clear and confidential process for dealing with those concerns.

### 2. Background

If an employee raises a concern about a danger or illegality that affects others at work, they are protected in certain circumstances by law under the Public Interest Disclosure Act 1998. This is commonly referred to as whistleblowing. A whistleblower is a person who exposes any kind of information or activity that is deemed illegal, unethical, or not correct within an organisation. The disclosure may be about the alleged wrongful conduct of the employer, a colleague, client, or any third party.

The Public Interest Disclosure Act 1998 protects employees from detrimental treatment or from being dismissed if they disclose certain serious concerns known as 'qualifying disclosures'. Qualifying public interest disclosures are those where the employee reasonably believes one or more of the following matters is happening, has happened, or is likely to happen in the future:

- criminal activity, e.g. fraud, financial irregularity, bribery or corruption
- failure to comply with a legal obligation
- a miscarriage of justice
- danger to health and safety
- damage to the environment
- attempts to conceal any information relating to the above.

### 3. Scope

This policy is intended to ensure that individuals feel confident and able to raise a serious concern they reasonably believe is true and is in the public interest, in the knowledge that their concern will

be taken seriously and that no action will be taken against them. It is not intended to be used for the following:

- to investigate and address complaints by staff; these should be raised under the College's grievance procedure;
- complaints by students about their programmes of study or research, or the services the College provides;
- to reconsider any matters which have already been addressed under the College's bullying and harassment, grievance, disciplinary or other procedures;
- to question financial or business decisions taken by the College.

Although the legislation offers protection specifically to employees, this procedure is available to all members of the College, including students, Governing Body Fellows, casual workers, agency workers, or those contracted to provide services to the College.

#### **4. Responsibilities**

Governing Body has overall responsibility for implementing this policy. It is supported by the Management Executive Team, which is responsible for keeping under review the College's policies and compliance with legislation and regulatory compliance.

Managers and supervisors have an important role to play in encouraging employees to report any concerns of wrongdoing they may have. Managers should ensure that any concerns raised are taken seriously and that action is taken to resolve concerns.

Any employee who has knowledge of, or reasonably suspects, any wrongdoing is taking place (or has happened or is likely to happen), is strongly encouraged to report this immediately to their line manager, or to follow the procedure below.

Disclosures must be made in good faith. The employee must reasonably believe the information disclosed and any allegation made is true. In the event of malicious or vexatious allegations, disciplinary action may be taken against the individual concerned.

All employees, irrespective of their role, are required not to subject any other member of staff or worker to detrimental treatment, bullying or harassment on the basis they have made a disclosure under this policy. Disciplinary action may be taken against anyone found to have acted in such a manner.

#### **5. Procedure**

An individual who wishes to report a concern about possible wrongdoing should do so in the first instance to the Bursar. If the complaint is about or implicates the Bursar, the matter should be reported to the Warden.

The individual making the disclosure does not have to be able to prove the allegations, but should have a reasonable and genuine belief that the information being disclosed is true and that the disclosure is in the public interest.

Disclosures should provide as much supporting evidence as possible.

Where requested, the College will respect (so far as we can legally) the confidentiality of any whistleblowing complaint received. Unsupported anonymous complaints and allegations will be treated with caution.

If the matter requires further investigation, this will be carried out and the individual making the disclosure will be informed of the outcome of the investigation and what action, if any, has been taken.

The person conducting the investigation shall not be the person who will ultimately take decisions based on the investigation. Complaints concerning financial matters will normally be referred to the College Accountant, unless he / she is the subject of the complaint. The individual conducting the investigation shall be entitled to draw on appropriate expertise where necessary (for example in the event of allegations of financial irregularity). Financial complaints may also require early notification to the Funding Council.

The person to whom the disclosure is reported will ensure that a written record is made of all stages of the procedure, including the matters raised, the conduct of any investigation and any action taken.

The action taken, including the outcome of the investigation, will be reported to the individual making the disclosure. In the event that no action is taken, an explanation will be given.

If the individual is not satisfied with the way in which the matter has been resolved, they should raise the matter with the appropriate organisation or body (e.g. the Police, the Environment Agency, the Health and Safety Executive).

Individuals will not be penalised or suffer detrimental treatment for making a disclosure under this policy.

## **6. Further information**

Further information about whistleblowing can be found at [www.gov.uk](http://www.gov.uk).

The charity Public Concern at Work ([www.pcaw.co.uk](http://www.pcaw.co.uk)) provides free confidential advice to anyone who has concerns about wrongdoing in the workplace.

## **7. Review**

This policy will be reviewed in February 2021.

The Governing Body of St Antony's College has approved this policy on 6<sup>th</sup> March 2019.