

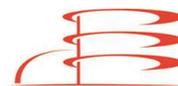
Bexhill 6th Form College

**CONFIDENTIAL
REPORTING
POLICY**

POLICY NUMBER: PG6

Reviewed & Approved by Audit Committee: **NOVEMBER 2018**
Approved by the Corporation: **DECEMBER 2018**

CONFIDENTIAL REPORTING POLICY



Bexhill 6th Form College

PREAMBLE

Bexhill College is committed to the highest possible standards of openness, probity and accountability. In line with that commitment we expect employees, and others that we deal with, who have serious concerns about any aspect of the College's work to come forward and voice those concerns. It is recognised that most cases will have to proceed on a confidential basis.

This policy document makes it clear that employees can do so without fear of victimisation, subsequent discrimination or disadvantage. This Confidential Reporting Policy is intended to encourage and enable employees to raise serious concerns within the College rather than overlooking a problem or 'blowing the whistle' outside.

The policy applies to all employees and those contractors working for Bexhill College on College premises, for example, agency staff, builders. It also covers suppliers and those providing services under a contract with the College in their own premises.

AIMS AND SCOPE OF THIS POLICY

This policy aims to:

- Encourage employees to feel confident in raising serious concerns and to question and act upon concerns about practice.
- Provide avenues for employees to raise those concerns and receive feedback on any action taken.
- Ensure that employees receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied.
- Reassure employees that you will be protected from possible reprisals or victimisation if you have a reasonable belief that you have made any disclosure in good faith.

There are existing procedures in place to enable you to lodge a grievance relating to your own employment. The Confidential Reporting Policy is intended to cover major concerns that fall outside the scope of other procedures. These include:

- Conduct which is an offence or a breach of law.
- Disclosures related to miscarriages of justice.
- Health and safety risks, including risks to the public as well as other employees.
- Damage to the environment.
- The unauthorised use of college funds.
- Possible fraud and corruption.
- Abuse of students.
- Child Protection & Safeguarding issues.
- Other unethical conduct.

Therefore, any serious concerns that employees have about any aspect of service provision or the conduct of employees of Bexhill College or Corporation members or others acting on behalf of the College can be reported under the Confidential Reporting Policy. This may be about something that:

- Makes an employee feel uncomfortable in terms of known standards, your experience or the standards you believe Bexhill College subscribes to.
- Is against Bexhill College's Articles and Instruments of Government or College policies.
- Falls below established standards of practice.
- Amounts to improper conduct.

SAFEGUARDS

Harassment or Victimisation:

The College is committed to good practice and high standards and wants to be supportive of employees.

The College recognises that the decision to report a concern can be a difficult one to make. If what is being reported is true, employees should have nothing to fear because they will be doing their duty to Bexhill College as a whole.

The College will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect employees when a concern is raised in good faith.

Any investigation into allegations of potential malpractice will not influence or be influenced by any disciplinary or redundancy procedures that might already be ongoing.

Confidentiality:

All concerns will be treated in confidence and every effort will be made not to reveal your identity if you so wish. At the appropriate time, however, employees may need to come forward as a witness.

Anonymous Allegations:

This policy encourages employees to identify themselves when making any allegation.

Concerns expressed anonymously are much less powerful but will be considered at the discretion of the College.

In exercising this discretion the factors to be taken into account would include:

- The seriousness of the issues raised.
- The credibility of the concern.
- The likelihood of confirming the allegation from attributable sources.

Untrue Allegations:

If an employee makes an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against them. If, however, an allegation is found to be made frivolously, maliciously or for personal gain, disciplinary action may be taken.

HOW TO RAISE A CONCERN

As a first step, concerns should normally be raised with your immediate line manager. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. If the line manager is not appropriate for any reason the employee should raise their concerns with the Director of Human Resources or the Principal, or if they are directly involved, with the Chair of the Corporation, via the Clerk.

Concerns may be raised verbally or in writing. Staff who wish to make a written report are invited to use the following format:

- The background and history of the concern (giving relevant dates);
- The reason why there is a particularly concerned about the situation

The earlier a concern is expressed, the easier it is to take action.

Although employees are not expected to prove beyond doubt the truth of an allegation, the information provided will need to demonstrate to the person contacted that there are reasonable grounds for concern.

Advice and guidance on how matters of concern may be pursued can be obtained from:

- The Director of Human Resources or Principal.
- Your union or professional association representative.

Employees may wish to consider discussing your concern with a colleague first and may find it easier to raise the matter if there are other employees who have had the same experience or concerns.

A trade union representative or a work colleague may be invited to be present during any meetings or interviews in connection with the concerns raised.

HOW BEXHILL COLLEGE WILL RESPOND

Bexhill College will respond to concerns. Where appropriate, the matters raised may:

- Be investigated by a member of the Senior Leadership team , or through the disciplinary process.
- Be referred to the police.
- Be referred to the external auditor.
- Form the subject of an independent enquiry.

In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The overriding principle, which the College will have in mind, is the public interest.

Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required this will be taken into account before any investigation is conducted.

Within ten working days of a concern being raised, the Principal will nominate a member of the Senior Leadership Team to address your concerns.

They will write to the employee:

- Acknowledging that the concern has been received.
- Indicating how the College proposes to deal with the matter.
- Giving an estimate of how long it will take to provide a final response.
- Outlining any initial enquiries that have been made, if appropriate.
- Supplying information on staff support mechanisms as appropriate.
- Confirming whether further investigations will take place and if not, why not.

The amount of contact between the staff considering the issue and the employee will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, the College will seek further information from the employee who has raised the concern.

Where any meeting is arranged off-site - if appropriate - a union representative or a work colleague can attend with the employee.

The College will take steps to minimise any difficulties, which the employee may experience as a result of raising a concern. For instance, if the employee is required to give evidence in criminal or disciplinary proceedings the College will arrange for you to receive advice about the procedure as appropriate.

Bexhill College accepts that employees need to be assured that the matter has been properly addressed. Thus, subject to legal and confidentiality constraints, the College will confirm the completion of any investigation which may or may not include details of the outcome. The outcome of any investigation will be final.

THE RESPONSIBLE PERSON

The Principal has overall responsibility for the maintenance and operation of this policy. He/she maintains a record of concerns raised and the outcomes (but in a form which does not endanger confidentiality) and will report as necessary to the Corporation.

Any records will be placed in a sealed envelope in the member of staff's HR file and marked as confidential to the Director of Human Resources, Principal and the member of staff concerned.