



# Whistleblowing Policy and Procedure

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## **1 Statement of Intent**

- 1.1 The Public Interest Disclosure Act 1998, and updates, has been introduced to protect employees from detrimental treatment following disclosure of their employer's illegal activities. Such disclosures must meet qualifying criteria as set out within the policy. The College will follow up on all disclosures in relevance to point 2 below and will also use legislative and College policies linked to the disclosure.
- 1.2 The College is committed to operating in an ethical and principled way. The aim of this policy and procedure is to provide employees with a means for raising genuine concerns of suspected bribery, breaches of the law and other serious wrongdoings as indicated in point 2 below.
- 1.3 The law protects employees who, out of a sense of public duty, want to reveal suspected wrongdoing or malpractice.
- 1.4 The law allows employees to raise what it defines as a 'protected disclosure'. In order to be a protected disclosure, a disclosure must relate to a specific subject matter as listed below, and the disclosure must also be made in an appropriate way. A 'protected disclosure' must, in the reasonable belief of the employee making it, also be made in the public interest. A protected disclosure must consist of information and not merely be allegations of suspected malpractice.

## **2 Introduction and Purpose**

- 2.1 The Act protects students, employees, some self-employed people working under a contract for services and agency employees.
- 2.2 A disclosure will only be protected if, in the reasonable belief of the employee, it relates to one or more of the following (which must either have occurred, be in the process of occurring or likely to occur):
  - A criminal offence.
  - Failure to comply with a legal obligation.
  - A miscarriage of justice.
  - The endangering of an individual's health and safety.
  - Damage to the environment.
  - Concealment of information relating to any of the above and/or the action of bribery.
- 2.3 The College encourages employees to raise genuine concerns about suspected wrongdoing at the earliest practicable stage. This policy and procedure is intended to provide safeguards to enable members of staff to raise concerns about malpractice, as listed above, in connection with the College.
- 2.4 This policy and procedure also aims to encourage employees to raise genuine concerns through internal College procedures without fear of adverse repercussions being taken against them. The law allows employees to raise such concerns externally and this policy and procedure informs employees how they can do so. However, a failure to raise a concern under this procedure may result in a disclosure losing its protected status under the law.
- 2.5 This policy and procedure also seeks to balance the need to allow a culture of openness against the need to protect other employees against vexatious allegations or allegations which are not well-founded.
- 2.6 The principles of openness and accountability which underpin legislation protecting whistleblowers are reflected in this policy and procedure. The College is also committed to ensuring compliance with the Bribery Act 2010.

- 2.7 This policy applies to all employees of the College, including apprentices; and workers (which includes any casual workers; home-based casual workers); and employees of subcontractors; and agency workers engaged by the College.
- 2.8 Employees who might be unsure whether it is appropriate to raise their concern under this policy and procedure or whether it is a personal grievance should approach Human Resources (HR) in confidence for advice.

### **3 Legal Background or Relevant Legislation**

Public Interest Disclosure Act 1998 (PIDA)  
The Employment Act 2008  
The Employment Tribunals (Constitution and Rules of Procedure) (Amendment) Regulations 2008  
The Bribery Act 2010  
Equality Act 2010 (Specific Duties) Regulations 2011

### **4 Related Policies**

Code of Conduct and Disciplinary Policy for Students  
Code of Conduct for Staff  
Disciplinary Policy and Procedure (Staff)  
Harassment and Bullying Policy  
Safeguarding Policy  
Recruitment and Selection Policy  
Equality and Diversity Policy  
Customer Complaints Procedure

### **5 Link to Procedure or Guidance**

- 5.1 Information which an employee reasonably believes tends to show one or more of the situations given above, should promptly be disclosed to their line manager, so that any appropriate action can be taken as quickly as possible. The [Whistleblowing Procedure \(appendix A\)](#) and the [Bribery and Corruption Allegation Procedure \(appendix B\)](#) provide more detail.
- 5.2 If it is inappropriate to make such a disclosure to their line manager, an employee can raise the issue with their Senior Leadership Team (SLT) member, or if it is a SLT member it should be raised with one of the Executive Leadership Team (ELT).
- 5.3 If the disclosure relates to the Principal and Chief Executive, an employee can raise the issue with the Clerk of the Corporation. In the event that the disclosure relates to the Clerk of the Corporation, an employee can raise the issue with the Chair of the Board of Governors.
- 5.4 Employees are encouraged to identify themselves when making a disclosure. If an anonymous disclosure is made, the College will not be in a position to notify the individual making the disclosure of the outcome of action taken by the College. Anonymity also means that the College will have difficulty in investigating such a concern. The College reserves the right to determine whether to apply this procedure in respect of an anonymised disclosure in light of the following considerations:
- The seriousness of the issues raised in the disclosure;
  - The credibility of the concern; and
  - How likely it is that the concern can be confirmed from attributable sources.
- 5.5 For further guidance in relation to this policy and procedure, or concerning the use of the disclosure procedure generally, employees should speak in confidence to HR or a local

representative.

5.6 Any employee who follows the official procedure to report a concern of malpractice, will have the matter treated confidentially and will not have their name disclosed to the alleged perpetrator of malpractice without the whistleblower's prior approval.

## **6 Responsibilities – Nominated Persons**

A minimum of two investigation officers will be assigned to the investigation and will consist of one senior manager plus one manager or a member of the Human Resource team.

## **7 Monitoring, Review and Evaluation**

The College will review the policy to take account of any new Government legislation, regulations or best practice documents, to ensure that staff are kept fully up to date with their responsibilities and duties with regard to this policy and procedures.

It is also recommended that the incidents are monitored by the strands of equality (i.e. gender, disability, race and ethnicity, age, LGBT - lesbian, gay, bisexual, transgender, religion and socio-economic) over a period of twelve months to identify any trends that need to be addressed.

## **8 Communication**

This policy and procedure is published on the staff intranet and the College website, and is made available on request in a number of formats as required.

Signed

..... Sarah Wright

Principal and CEO

Date

..... 3 February 2016

## 9 Equality & Diversity Impact Assessment Summary

	AGE	DISABILITY	GENDER Reassignment	MARITAL STATUS	PREGNANCY & MATERNITY	RACE	RELIGION or BELIEF	SEX	SEXUAL ORIENTATION
Which of the following protected characteristics may be affected by this policy or procedure? <i>(please mark the relevant box)</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Other concerns (e.g. protected groups such as carers, young parents, women during pregnancy, young people living independently)									
Does this policy impact on: <i>(please mark the relevant box)</i>	Staff <input checked="" type="checkbox"/>	Students <input checked="" type="checkbox"/>	Parents or Carers <input checked="" type="checkbox"/>	Members of the Public <input checked="" type="checkbox"/>	External providers of services <input checked="" type="checkbox"/>				
Does your assessment show that this policy/procedure is affecting relations between different protected characteristics? <i>(please mark the relevant box)</i>	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>				
If yes, can the adverse impact be justified on the grounds of promoting equality of opportunity for one group, or as part of a wider strategy of positive action in relation to particular groups? <i>(please give reasonable justification)</i>									
<b>Consultation</b> What steps have been taken to ensure that the different protected groups have been consulted during the development of this policy/procedure?	<p>The policy was devised with relevance to AoC and the following representative groups have been involved with the impact assessment of this policy:</p> <ul style="list-style-type: none"> <li>• Employee Forum</li> <li>• Equality Diversity Group</li> </ul> <p>The policy is also published to staff for an agreed period to ascertain further feedback before final placement on the staff intranet and College website.</p>								
<b>Staff Development and Training</b> Please list any staff development or training issues arising from this assessment.	SLT Awareness of policies and disclosure process provided at induction								
<b>Change/Modification</b> As a result of the Impact Assessment, have any changes/modifications to this policy/procedure been made?	The policy point 6 and point 7, as well as the Procedure appendix A, point 7 have been altered.								



# Whistleblowing Procedure

## 1. Addressing allegations

- 1.1 Addressing allegations or evidence of any potential irregularities, including fraud, corruption or impropriety must be the focus of the policy and procedure.
- 1.2 Should an employee raise a concern under this procedure that is subsequently found to be a deliberately false and malicious accusation, this will be viewed as a serious disciplinary matter and dealt with under the College's Disciplinary Procedure. Anonymity may not be possible in this circumstance but impartiality must remain in place.

## 2. Procedure for investigation of a disclosure

- 2.1 When an employee makes a disclosure, the College will acknowledge its receipt, in writing, within a reasonable time.
- 2.2 The College will then determine whether or not it believes that the disclosure is wholly without substance or merit. If the College considers that the disclosure does not have sufficient merit to warrant further action, the employee will be notified in writing of the reasons for the College's decision and advised that no further action will be taken by the College under this policy and procedure. Considerations to be taken into account when making this determination may include the following:
  - If the College is satisfied that the employee does not have a reasonable belief for the suspected malpractice; or
  - If the matter is already the subject of legal proceedings or appropriate action by an external body; or
  - If the matter is already subject to another, appropriate College procedure.
- 2.3 When an employee makes a disclosure which has sufficient substance or merit warranting further action, the College will take action it deems appropriate (including action under any other applicable College policy or procedure or external body). Possible actions could include internal investigation; referral to the College's auditors; or referral to relevant external bodies such as the police, OFSTED, Health and Safety Executive or the Information Commissioner's Office.
- 2.4 If appropriate, any internal investigation would be conducted by a manager of the College without any direct association with the individual to whom the disclosure relates, or by an external investigator appointed by the College as appropriate. Depending on the seriousness of the concern raised and the seniority of the employee making the disclosure, it would be appropriate for a senior manager or a designated officer, such as the Clerk of the Corporation, to investigate the concern.

- 2.5 Any recommendations for further action made by the College will be addressed to the Principal or Chair of the College's Board of Governors, as appropriate in the circumstances. The recipient will take all steps within their power to ensure the recommendations are implemented unless there are good reasons for not doing so.
- 2.6 The employee making the disclosure will be notified of the outcome of any action taken by the College under this policy and procedure within a reasonable period of time. If the employee is not satisfied that their concern has been appropriately addressed, they can appeal against the outcome by raising the issue with the Executive Leadership Team within 10 working days.
- 2.7 The Principal and Chief Executive will make a final decision on action to be taken and notify the employee making the disclosure. The procedure encourages the expeditious investigation of disclosures and can specify timelines for different stages of the procedure. However, timescales should be flexible, taking into account that different types of concerns will require varying time for investigation.
- 2.8 All communications with the employee making the disclosure should be in writing and sent to the employee's home address rather than through the College's internal mail. If investigations into the concern are prolonged, the College will keep the employee updated as to the progress of the investigation and an estimated timeframe for its conclusion.

### **3. Safeguards for employees making a disclosure**

- 3.1 An employee making a disclosure under this procedure can expect their matter to be treated confidentially by the College and, where applicable, their name will not be disclosed to anyone implicated in the suspected wrongdoing, without their prior approval. For confidentiality purposes, if the employee requests to raise their concern verbally, the College will provide a suitable area for them to do so.
- 3.2 The College will take all reasonable steps to ensure that any report of recommendations, or other relevant documentation, produced by the College does not identify the employee making the disclosure without their written consent, or unless the College is legally obliged to do so, or for the purposes of seeking legal advice.
- 3.3 No formal disciplinary action will be taken against an employee on the grounds of making a disclosure made under this policy or procedure. This does not prevent the College from bringing disciplinary action against an employee where the College has grounds to believe that a disclosure was made maliciously or is vexatious, or where a disclosure is made outside the College without reasonable grounds.
- 3.4 An employee will not suffer dismissal or any detrimental action or omission of any type by the College for making a disclosure in accordance with this policy and procedure. Equally, where an employee is threatened, bullied, pressurised or victimised by a colleague for making a disclosure, disciplinary action will be taken by the College against the colleague in question.

### **4. Disclosure to external bodies**

- 4.1 This policy and procedure has been implemented to allow employees to raise disclosures internally within the College. An employee has the right to make a disclosure outside of the College where there are reasonable grounds to do so and in accordance with the law.
- 4.2 Employees may make a disclosure to an appropriate external body prescribed by the law. This list of 'prescribed' organisations and bodies can be found in information on the GOV.UK website.
- 4.3 Employees can also make disclosures on a confidential basis to a practicing solicitor or barrister.

- 4.4 If an employee seeks advice outside of the College, they must be careful not to breach any confidentiality obligations or damage the College's reputation in so doing.

## **5. Accountability**

- 5.1 The College will keep a record of all concerns raised under this policy and procedure (including cases where the College deems that there is no case to answer and therefore that no action should be taken) and will report to the Audit Committee on an annual basis.

## **6. Further assistance for employees**

- 6.1 The College will not tolerate any harassment or victimisation of employees who make disclosures. If, at any stage of this procedure a worker feels that they are being subject to informal pressures, bullying or harassment due to making a disclosure, they should raise this matter, in writing, to their SLT member or an ELT member.
- 6.2 An employee making a disclosure may want to confidentially request counselling or other support from the College's occupational health service. Any such request for counselling or support services should be addressed to Human Resources. Such a request would be made in confidence.
- 6.3 Employees can also contact the charity Public Concern at Work for confidential advice on whistleblowing issues. Contact details are as follows:

3rd Floor, Bank Chambers  
6 - 10 Borough High Street  
London SE1 9QQ  
Whistleblowing Advice Line: 020 7404 6609  
<http://www.pcaw.org.uk>

## **7. Procedures for Members of the Corporation**

- 7.1 Any concerns should be raised with the Clerk to the Corporation, who will record the concern in a 'Whistleblowing Register' and inform the Chair of the Corporation (or in his absence the Vice-Chair), the Principal and the Chair of Audit. The Clerk will investigate the concerns, drawing upon the professional support of the College auditors and solicitors as necessary and will report the outcome of investigations to the Audit Committee and Corporation.
- 7.2 If matters of criminal responsibility are involved, the Clerk will, having sought the advice of the College solicitors, consult with the Chair of the Corporation and the Chair of Audit as to whether to inform the police.
- 7.3 If the allegations concern the Chair of the Corporation and the Principal, the Clerk will inform the regulatory authority and seek their advice.
- 7.4 If the allegations concern the Clerk, then the Chair of the Corporation (and in his absence the Vice-Chair) and the Chair of Audit shall be informed and the College investigation officers shall be commissioned to conduct an investigation in place of the Clerk.

## **8. Procedures for Regularity allegations**

- 8.1 In accordance with the Financial Regulations, whenever any employee becomes aware of any matter that involves, or is likely or suspected to involve, any irregularity or illegality, the employee concerned shall immediately inform the appropriate member of the Executive

Leadership Team, who shall forthwith draw the matter to the attention of the Clerk to the Corporation, so that such audit action may be instigated as may be deemed necessary.

8.2 While every reasonable endeavour will be made to maintain confidentiality during the investigation, it should be noted that if there is evidence of criminal activity, then, subject to the advice of the College's solicitors, the Clerk will seek the approval of the Chair of Audit and the Chair of the Corporation to inform the police. Except as described above, or where it conflicts otherwise with obligations under current law, the matters will not be made more widely known unless it is with the whistleblower's agreement.

## **9. Procedures for Members of the Public**

9.1 Grievances from students and complaints from members of the public should normally be dealt with in accordance with the published customer complaints procedures.

## **10. Anonymous Concerns**

10.1 It is recognised that a number of serious issues within the Further Education sector have first been raised anonymously. On receipt of an anonymous allegation it will be recorded in the register and the Clerk will consult with the Chair of Audit and the Chair of the Corporation as to whether to investigate the allegation as far as is practicable, or whether to take no further action until or unless other corroborative evidence becomes available.

Signed

Kim Morton

Date 8 July 2015

Deputy CEO Corporate Services



# Bribery and Corruption Allegation Procedure

## 1. Addressing allegations

- 1.1 The Bribery Act 2010 aims to promote anti-bribery practices amongst businesses. An organisation will commit a criminal offence, if it fails to prevent bribery that is intended to get or keep business or an advantage in the conduct of business for the organisation. It is a criminal offence to give, promise or offer a bribe, agree to receive or accept a bribe either at home or abroad and the maximum penalty for bribery is 10 years imprisonment, with an unlimited fine.
- 1.2 The Bribery Act 2010 repealed previous corruption legislation and has introduced the offences of offering and/or receiving a bribe. It also places specific responsibility on organisations to have in place sufficient and adequate procedures to prevent bribery and corruption taking place.

The Bribery Act replaces the offences at common law and under the Public Bodies Corrupt Practices Act 1889, the Prevention of Corruption Act 1906 and the Prevention of Corruption Act 1916 with new consolidated bribery legislation.

Bribery is defined as “Inducement for an action which is illegal unethical or a breach of trust. Inducements can take the form of gifts, loans, fees, rewards or other privileges.” Corruption is broadly defined as the offering of the acceptance of inducements, gifts or favours, payments or benefits in kind which may influence the improper action of any person; corruption does not always result in a loss. The corrupt person may not benefit directly from their deeds; however, they may be unreasonably using their position to give some advantage to another.

- 1.3 Organisations need to take steps to address the risks of bribery; they need to demonstrate that they have put clear, practical bribery prevention policies and procedures in place.
- 1.4 Addressing allegations or evidence of any potential bribery and corruption must be the focus of the procedure.
- 1.5 Should an employee raise a concern under this procedure that is subsequently found to be a deliberately false and malicious accusation, this will be viewed as a serious disciplinary matter and dealt with under the College’s Disciplinary Procedure. Anonymity may not be possible in this circumstance but impartiality must remain in place.

## 2. Procedure for investigation of a disclosure

- 2.1 When an employee makes a disclosure, the College will acknowledge its receipt, in writing, within a reasonable time.
- 2.2 The College will then determine whether or not it believes that the disclosure is wholly without substance or merit. If the College considers that the disclosure does not have sufficient merit to warrant further action, the employee will be notified in writing of the reasons for the College’s decision and advised that no further action will be taken by the College under this

policy and procedure. Considerations to be taken into account when making this determination may include the following:

- If the College is satisfied that the employee does not have a reasonable belief for the suspected bribery or corruption; or
- If the matter is already the subject of legal proceedings or appropriate action by an external body; or
- If the matter is already subject to another, appropriate College procedure.

- 2.3 When an employee makes a disclosure which has sufficient substance or merit warranting further action, the College will take action it deems appropriate (including action under any other applicable College policy or procedure or external body). Possible actions could include internal investigation; referral to the College's auditors; or referral to relevant external bodies such as the police, HMRC.
- 2.4 If appropriate, any internal investigation would be conducted by a manager of the College without any direct association with the individual to whom the disclosure relates, or by an external investigator appointed by the College as appropriate. Depending on the seriousness of the concern raised and the seniority of the employee making the disclosure, it would be appropriate for a senior manager or a designated officer, such as the Clerk of the Corporation, to investigate the concern.
- 2.5 Any recommendations for further action made by the College will be addressed to the Principal or Chair of the College's Board of Governors, as appropriate in the circumstances. The recipient will take all steps within their power to ensure the recommendations are implemented unless there are good reasons for it to be conducted entirely by an external body.
- 2.6 The employee making the disclosure may not be notified of the outcome of any action taken by the College or the external body under this policy and procedure in respect of legal proceedings.
- 2.7 The procedure encourages the expeditious investigation of such disclosures and so will not specify timelines for any procedure that may ensue. However, timescales may be reliant on external considerations that may require varying time for investigation and outcomes.

### **3. Procedure for investigation of bribery**

- 3.1 There are two general offences: the first covers the offering, promising or giving of a bribe known as active bribery; and the second is passive bribery, which is requesting, agreeing to receive, or the accepting of a bribe.
- 3.2 The College prohibits staff and Corporation members from offering, giving, soliciting or accepting any bribe. The bribe might include cash, a gift or other inducement, to or from any person or organisation, wherever they are situated and irrespective of whether or not they are a public official/body or private person or company, by any individual governor, employee, agent or other person or body acting on the College's behalf. The bribe might be made in order to:
- Gain any commercial, contractual or regulatory advantage for the College in a way which is unethical;
  - Gain any personal advantage, pecuniary, or otherwise, for the individual or anyone connected with the individual.
- 3.3 What the Act doesn't do is prohibit genuine promotional and other business expenditure, such as providing tickets for sporting events, promotional gifts or taking clients to dinner. However, organisations must now keep transparent records of hospitality expenditure, and must ensure that any promotional activities are reasonable and proportionate. .

3.4 This regulation is not intended to prohibit appropriate corporate entertainment and/or hospitality undertaken in connection with the College's business activities, provided the activity is customary under the circumstances, is proportionate, and is properly recorded / disclosed to the College in accordance with its procedures. All such activities must be reported to the PA to the Principal, and the Clerk to the Corporation in the case of Corporation members.

3.4 Staff and Corporation members are requested to remain vigilant in preventing, detecting and reporting bribery. Staff and Corporation members are expected to report any concerns regarding any suspected bribery in accordance with the College's procedures.

#### **4. Disclosures made internally or to external bodies**

4.1 The Whistleblowing Policy makes it easier for staff to report any acts of fraud, bribery, corruption or impropriety. An employee making a disclosure under this procedure can expect their matter to be treated confidentially by the College and, where applicable, their name will not be disclosed to anyone implicated in the suspected wrongdoing, without their prior approval. For confidentiality purposes, if the employee requests to raise their concern verbally, the College will provide a suitable area for them to do so.

4.2 The College will take all reasonable steps to ensure that any report of recommendations, or other relevant documentation, produced by the College does not identify the employee making the disclosure without their written consent, or unless the College is legally obliged to do so, or for the purposes of seeking legal advice.

4.3 No formal disciplinary action will be taken against an employee on the grounds of making a disclosure made under this policy or procedure. This does not prevent the College from bringing disciplinary action against an employee where the College has grounds to believe that a disclosure was made maliciously or is vexatious, or where a disclosure is made outside the College without reasonable grounds.

4.4 An employee will not suffer dismissal or any detrimental action or omission of any type by the College for making a disclosure in accordance with this policy and procedure. Equally, where an employee is threatened, bullied, pressurised or victimised by a colleague for making a disclosure, disciplinary action will be taken by the College against the colleague in question.

4.5 This policy and procedure has been implemented to allow employees to raise disclosures internally within the College. An employee may not make a direct disclosure outside of the College as this course of action will be conducted by appropriate senior personnel if it is deemed reasonable grounds to do so and in accordance with the law.

#### **5. Accountability**

5.1 The College will keep a record of all concerns raised under this policy and procedure (including cases where the College deems that there is no case to answer and therefore that no action should be taken) and will report to the Audit Committee on an annual basis.

#### **6. Further assistance for employees**

6.1 The College will not tolerate any harassment or victimisation of employees who make disclosures. If, at any stage of this procedure a worker feels that they are being subject to informal pressures, bullying or harassment due to making a disclosure, they should raise this matter to their SLT member or an ELT member.

#### **7. Procedures for Members of the Corporation**

7.1 Any concerns should be raised with the Clerk to the Corporation, who will record the concern in a 'Whistleblowing Register' and inform the Chair of the Corporation (or in their absence the Vice-Chair), the Principal and the Chair of Audit. The Clerk will investigate the concerns,

drawing upon the professional support of the College auditors and solicitors as necessary and will report the outcome of investigations to the Audit Committee and Corporation.

- 7.2 If matters of criminal responsibility are involved, the Clerk will, having sought the advice of the College solicitors, consult with the Chair of the Corporation and the Chair of Audit in order to follow up with the police.
- 7.3 If the allegations concern the Chair of the Corporation and the Principal, the Clerk will inform the regulatory authority and seek their advice.
- 7.4 If the allegations concern the Clerk, then the Chair of the Corporation (and in their absence the Vice-Chair) and the Chair of Audit shall be informed and the College investigation officers shall be commissioned to conduct an investigation in place of the Clerk.

## **8. Procedures for Regularity allegations**

- 8.1 In accordance with the Financial Regulations, whenever any employee becomes aware of any matter that involves, or is likely or suspected to involve, any irregularity or illegality, the employee concerned shall immediately inform the appropriate member of the Executive Leadership Team, who shall forthwith draw the matter to the attention of the Clerk to the Corporation, so that such audit action may be instigated as may be deemed necessary.
- 8.2 While every reasonable endeavour will be made to maintain confidentiality during the investigation, it should be noted that if there is evidence of criminal activity, then, subject to the advice of the College's solicitors, the Clerk will seek the approval of the Chair of Audit and the Chair of the Corporation to inform the police. Except as described above, or where it conflicts otherwise with obligations under current law, the matters will not be made more widely known.

## **9. Procedures for Members of the Public**

- 9.1 Grievances from students and complaints from members of the public should normally be dealt with in accordance with the published customer complaints procedures.

## **10. Anonymous Concerns**

- 10.1 It is recognised that a number of serious issues within the Further Education sector have first been raised anonymously. On receipt of an anonymous allegation it will be recorded in the register and the Principal will consult with ELT on appropriate action. If the issue involves a member of ELT the Clerk will consult with the Chair of Audit and the Chair of the Corporation as to the allegation and what action if any is relevant at this stage or if further evidence is required.

Signed

Kim Morton

Date 3 February 2016

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Deputy CEO Corporate Services