National Extension College

Whistleblowing Policy

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WHISTLEBLOWING POLICY

Revision History

Version	Last revised	Next review date	Policy Owner	Notes
1.0	May 2021	May 2022	Office Manager/CEO	Version 1.0 is the revised former policy and procedure
1.1	May 2022	May 2023	Office Manager/CEO	No Edits
2	May 2023	May 2024	Office Manager/CEO	No Edits
3	Nov 2023	Nov 2024	Office Manager/CEO	No Edits but reformatted
4	May 2025	May 2026	Office Manager/CEO	Reformatted to align with NEC's new branding and style. Minor changes to content
5	Sept 2026	Sept 2027	Office Manager/CEO	Minor changes to public policy now reflected and documented by the DSL.

Contents

1.Introduction 2
2 What is Whistleblowing? 2
3. Why have a Whistleblowing policy? 2
4. Who can raise a concern? 3
5. Can you whistle blow anonymously? 3
6. What should you do if you want to whistleblow? 3
7. What should you not do? 4
8. To whom should you take your concern? 4
9. What happens next? 4
10. Investigation 4
11. External Disclosure 5
12. Whistleblowing to other bodies 5
13. Protection against detrimental treatment 5
APPENDICES 7
Appendix 1 - Confidential Reporting Procedure Flowchart 7
Appendix 2 - Model Whistleblowing Form 8

WHISTLEBLOWING POLICY

1. Introduction

The National Extension College (NEC) always conducts its business with the highest standards of integrity and honesty. It expects all its staff and tutors ('relevant individuals ') to do the same. We ask relevant individuals to report any suspected wrongdoing by the NEC or its staff.

2 What is Whistleblowing?

Whistleblowing simply means reporting suspected wrongdoing at work. The official term for this is 'making a disclosure in the public interest.' The Public Interest Disclosure Act 1998 protects individuals from reprisals if they 'blow the whistle' within the organisation and, if there is good reason, to another organisation.

The NEC's Whistleblowing Policy covers what relevant individuals believe to be genuine concerns involving:

- Malpractice such as:
  - Actions contrary to any of NEC's policies.
  - Actions contrary to any regulations set by a regulatory body to which the NEC is subject;
  - Financial malpractice or maladministration; or
  - Failure to follow financial, procurement and contract procedure rules;
- A criminal offence;
- The breach of a legal obligation;
- A miscarriage of justice;
- A danger to the health and safety of any individual;
- Sexual harassment
- Damage to the environment; or
- Deliberate concealment of information tending to show any of the above seven matters.

Reporting concerns about these things are known as 'qualifying disclosures'. If staff, members or suppliers believe any of these things are happening within the Institute, we want to know about it.

3. Why have a Whistleblowing policy?

Because we operate to the highest standards of honesty and integrity, it is in our interests for relevant individuals to report any suspected wrongdoing within the NEC. We will treat all disclosures consistently and fairly.

We know that people can be uncomfortable about raising concerns. They may not know how to do so or who to tell. This policy explains the process. It also gives people confidence that they can raise anything that concerns them within the Institute, that what they say will be taken seriously, treated as confidential wherever possible and that the NEC will not penalise them for doing so.

This policy is for concerns that are in the public interest (affecting others) and does not replace the NEC's grievance procedure, which is there for staff to raise any issue that is personal or to complain about a management decision.

4. Who can raise a concern?

Any NEC member, employee, student or supplier can raise a concern. They do not need to have proof of wrongdoing to do this; just a reasonable belief that the issue is taking place at present, took place in the past, or is likely to happen in the future. However, there are rules, which are as follows:

- You must disclose the information in good faith
- You must believe that it is true
- You must not act maliciously or make false allegations
- You must not act for personal gain.

If you ask for confidentiality when you raise your concern, we will meet your request as far as we reasonably can. If we believe that we cannot protect your confidentiality (for example, if doing so means we cannot conduct a proper investigation) we will discuss this with you.

We will not take any action against you for raising a whistleblowing concern in good faith. Not only is this good practice, but workers are also protected by law from being dismissed if they make qualifying disclosures, and this is a 'day-one right'. However, if an employee or member makes an allegation without having reasonable grounds for believing it to be true, makes it for personal gain, or makes it maliciously, we may take disciplinary action.

5. Can you whistle blow anonymously?

It is your choice, and you can disclose information to us anonymously if you want. However, we would prefer it if you reported your concerns to us personally. This is because there are risks when people whistle blow anonymously. These are:

- It is harder to investigate the concern if people cannot ask follow-up questions
- It is easier to get protection for the whistle-blower under the Public Interest Disclosure Act if concerns are raised openly
- It is harder to give the whistle-blower feedback, a timetable for action or the results of any investigation
- Being anonymous does not stop others from speculating on who raised the concern

6. What should you do if you want to whistleblow?

- First, make a note of all relevant details, such as what was said in conversations, the date, time and the names of parties involved. Be accurate in your claims.
- Bring the issue to our attention as soon as you can after you know about it.

7. What should you not do?

- Do not approach or accuse any individuals directly or try to investigate the matter yourself.

- Do not communicate your suspicions to anyone other than those with the proper authority.

8. To whom should you take your concern?

In the first instance you should report any concerns you may have to your line manager. However, where the concern relates to your line manager, or it is not appropriate to make the report to your line manager then this should be raised with the CEO If your concerns are about the CEO, then your concerns can be raised with the Chair of the NEC Board: Vanessa Pittard at vanessa.pittard@nec.ac.uk

9. What happens next?

You may submit your concerns in any format – a conversation, a telephone call, an email or a letter. You may be asked to confirm any concerns you raise verbally in writing or to confirm a written record of a verbal report. Your disclosure must be more than simply information, an opinion or an allegation. It must include sufficient factual information to count as a protected disclosure and tend to show that there has been or is likely to be a relevant failure

All concerns reported will be treated in the utmost confidence.

10. Investigation

Following receipt of a disclosure made under this policy, an investigation meeting will be held by the person to whom you have reported your concerns. The purpose of this meeting is to gather as much information as possible from you regarding your concerns, including whether you have any supporting evidence or can identify any witnesses. This meeting will be held within five working days following receipt of your disclosure.

After this meeting, the person to whom you have reported your concerns will make arrangements for a full investigation into the concerns raised. This may require the involvement of other managers or external independent investigators. The investigation will aim to gather all relevant information including relevant documentary evidence or witness statements.

We will aim to complete this investigation within 15 working days following receipt of the disclosure. If this is not possible, the investigating manager will speak to you in advance of the completion deadline to agree to an extended period of investigation and will confirm this in writing.

Once the investigation is complete, the person responsible for the investigation will write to you confirming the outcome.

11. External Disclosure

If you are not happy with the NEC's response at the end of this process and continue to believe that the information disclosed, and any allegations contained in it, are true, you can take it further with the appropriate organisation, regulatory body or a legal adviser.

You may find it useful to speak to the independent whistleblowing charity Protect. Their website is http://www.protect-advice.org.uk/, their Whistleblowing Advice Line is 020 3117 2520 and their online contact form is available at:
https://protect-advice.org.uk/contact-the-advice-line/

12. Whistleblowing to other bodies

If staff suspect wrongdoing is happening at their place of work, they should first find out if their employer has a whistleblowing policy and follow it.

If they feel they cannot do this, there are a number of people and bodies ('prescribed bodies' they can whistle blow to.

Staff should be aware that workers should only contact a prescribed person or body if they think that their employer:

- will cover up the disclosure
- would treat them unfairly if they made a disclosure
- have already been told about the issue and have done nothing about it A list of prescribed bodies and people can be found in the link below:

Whistleblowing: list of prescribed people and bodies - GOV.UK

13. Protection against detrimental treatment

Everyone who raises matters of concern under this policy is protected against detrimental treatment, up to and including dismissal, because they have made a disclosure.

Bullying, harassment or any other detrimental treatment afforded to a colleague who has made a qualifying disclosure is unacceptable. Anyone found to have acted in such a manner will be subject to disciplinary action.

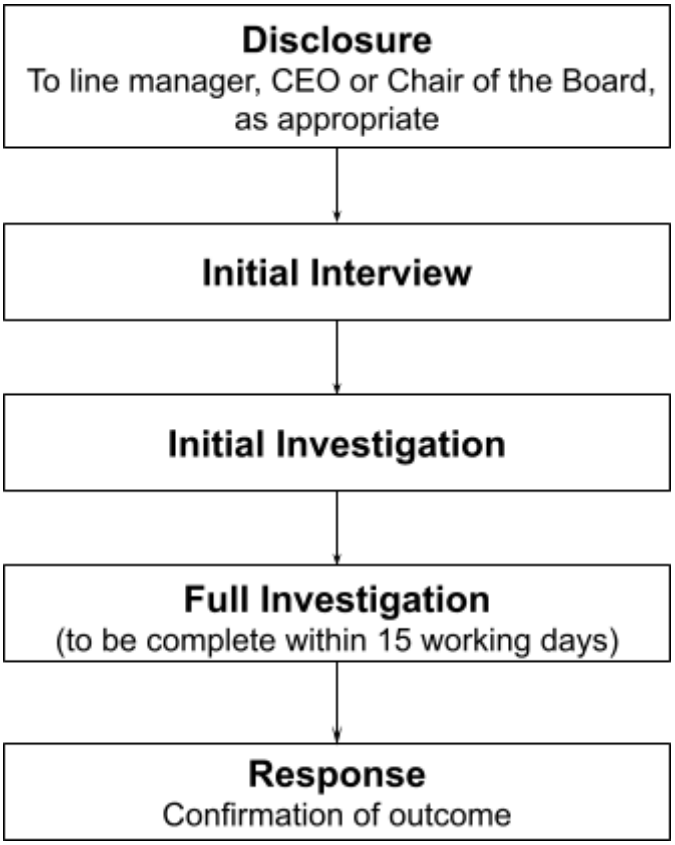
In the event that you believe you are being subjected to a detriment by any person within NEC as a result of your decision to invoke the procedure, you should inform the Chief Executive immediately and appropriate action under the grievance procedure will be taken to protect you from any reprisals or harassment. Any employee who believes they were dismissed for whistleblowing can apply for 'interim relief' to have salary or employment continued while a tribunal case is pending.

14. MONITORING AND REVIEW OF THE POLICY

We will continue to review the effectiveness of this policy to ensure it is achieving its stated objectives.

APPENDICES

Appendix 1 - Confidential Reporting Procedure Flowchart



Appendix 2 - Model Whistleblowing Form

Making a Public Interest Disclosure (Whistleblowing)
Guidance This form is intended for use by any individual working for the National Extension College (NEC), including contractors, agency workers and volunteers, who wishes to raise an issue about wrongdoing. This form should be used to report wrongdoing within the NEC, (for example, financial irregularities or health and safety concerns), rather than to raise a personal grievance (for example, if you would like to make an allegation of bullying or harassment or are complaining that your contract of employment has been breached). If you are unsure about whether your concerns are best dealt with under the NEC's Whistleblowing Policy or Grievance Procedure, please read the Whistleblowing Policy, which provides examples of the issues that should be reported using this form. Once you have submitted this form, the whistleblowing procedure will be invoked. This will result in an investigation, which will not involve anyone, (for example, your line manager) you may have implicated below. In certain circumstances, you can request that your concerns be kept anonymous. Where possible, the organisation will respect a request for anonymity, but cannot guarantee that it will be able to do so. This form should be completed and delivered to the Chief Executive / Vice-chair of the Board of Trustees in an envelope marked "confidential" or sent as an email attachment with "confidential" in the subject line.

Formal Public Interest Disclosure (Whistleblowing)	
Employee's name:	
Employee's job title:	
Employee's department:	
Date:	
Does your public interest disclosure relate to your line manager?	Yes / No

Summary of disclosure:
Please set out the details of the issue that you wish to raise, providing examples where possible, particularly dates, times, locations and the identities of those involved. You may attach additional sheets if required.

Individuals involved:	
Please provide the names and contact details of any people involved in your concerns, including witnesses.	
Outcome requested:	
Please set out how you would like to see the issue dealt with, and why and how you believe that this will resolve the issue.	
Declaration:	
I confirm that the above statements are true to the best of my knowledge, information and belief. I understand that, if I knowingly make false allegations, this may result in the organisation taking disciplinary action against me.	
Form completed by:	
Signature:	
For completion by the organisation:	
Date form received by the organisation:	
Name of recipient and job role:	
Signature:	