

## Whistleblowing Policy

### Introduction

Skills College UK aims to maintain the highest standards of openness, decency, integrity and accountability in its work. Everyone who works with or for SCUK must be vigilant for signs of wrongdoing or criminal activity by individuals or organisations working with or for SCUK and are encouraged to report such behaviour using this policy to the owners.

This procedure applies to employees, workers, agency workers, volunteers, partner organisations, suppliers, agents or sub-contractors of SCUK or any person associated with SCUK wherever located. This process is separate from and in addition to SCUK's grievance and complaints processes for employees, learners and customers. If an individual is uncertain as to whether or not something is within the scope of this process, they should seek advice from the owners.

SCUK will not tolerate the intimidation or victimisation of anyone raising a genuine concern under this policy. Anyone who tries to deter, intimidate or victimise an individual in a bid to prevent them from reporting a suspicion, will be subject to appropriate formal action and, if appropriate, may be reported to the relevant authorities.

### Equal Opportunities

SCUK aims to treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity.

### What Should be Reported

A reportable act is one made in the public interest including but not limited to learners, staff, customers or members of the general public by an individual who has a reasonable belief that one of the following is being, has been, or is likely to be, committed:

- Criminal offences (e.g. fraud, bribery, expenses fraud, corruption, money laundering, modern day slavery, supporting or involvement in terrorism)
- Failure to comply with legal obligations or regulatory requirements
- A miscarriage of justice
- Endangering someone's health and safety
- Damage to the environment
- Covering up wrongdoing
- Unethical conduct – including plagiarism or unfair assessment



Individual issues (e.g. bullying, harassment, discrimination) should be reported under SCUK's complaints procedure. Not reporting a suspicion when there are clear grounds for doing so could result in disciplinary action or other sanctions.

### Procedure

1. Concerns should be raised as early as possible. Concerns may be raised verbally but preferably in writing or by email, giving any background and history, including relevant dates and any witnesses.

In the first instance, concerns should be raised with your immediate line manager. However, if your line manager is involved in the wrongdoing or you feel unable to raise the matter with your line manager, you should report your concerns to one of the following:

- A more senior manager
- A Skills College UK representative.
- SCUK's owners [richard@scuk-ltd.co.uk](mailto:richard@scuk-ltd.co.uk) / [will@scuk-ltd.co.uk](mailto:will@scuk-ltd.co.uk)

2. An investigation will then be carried out. You must not investigate yourself, this could result in either the destruction or contamination of evidence or put your own safety at risk.

3. Following the investigation, the 'whistleblower' will be informed of the outcome and what action will be taken, which may be to do nothing or to follow the full disciplinary procedure. However, the need for confidentiality may mean that you cannot be given much detail. You should treat any information you are given regarding the investigation as confidential.

4. If you believe that your concern has not been dealt with properly or the wrongdoing is still going on, you should raise your concerns with an Executive Director or if that is not possible then an external authority such as the police should be considered but, only when all internal avenues have been exhausted.

### Anonymity

Individuals are encouraged to put their name to any whistleblowing disclosures they make. Concerns expressed anonymously will be considered at the discretion of SCUK, taking into account:

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

## Confidentiality

SCUK will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation.

However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

## Reporting Externally

If, on conclusion of the procedure outlined above, the whistleblower reasonably believes that the appropriate action has not been taken, he/she should report the matter to one of the following relevant UK bodies:

- the Education and Skills Funding Agency
- Ofsted
- funding partners
- HM Revenue & Customs
- the Financial Conduct Authority (formerly the Financial Services Authority)
- the Competition and Markets Authority
- the Health and Safety Executive
- the Environment Agency
- the Independent Office for Police Conduct
- the Serious Fraud Office

## Malicious Reports

Individuals who make malicious accusations under this policy i.e. those which are not true, may be subject to formal action (such as disciplinary action). The whistleblowing procedure is to be referred to for genuine concerns regarding the ethical actions of the Company, its employees and associates as well as for the wellbeing of all its learners.

## Useful Contacts

The owners of Skills College UK operate an open door policy and as such, if you require further advice, you can speak to one of the owners directly; [richard@scuk-ltd.co.uk](mailto:richard@scuk-ltd.co.uk) or [will@scuk-ltd.co.uk](mailto:will@scuk-ltd.co.uk)

Advice can also be obtained from outside SCUK through WhistleblowersUK ([www.wbuk.org](http://www.wbuk.org))