



WHISTLEBLOWING POLICY



1. About this policy

- 1.1 We are committed to conducting our business with honesty and integrity, and we expect all members and staff to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur. We also expect centres to have a culture of openness where members and staff can freely raise any concerns about activities and practices without the risk of adverse consequences.
- 1.2 The aims of this policy are:
- (a) to encourage Advisory Board members, volunteers staff, centres and learners to report suspected wrongdoing as soon as possible particularly with regard to the delivery of qualifications and services, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
 - (b) To provide Advisory Board members, volunteers, staff, centres and learners with guidance as to how to raise those concerns.
 - (c) To reassure Advisory Board members, volunteers, staff, centres and learners that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- 1.3 This policy covers all Advisory Board members, volunteers, staff, centres and learners consultants, contractors, interns, casual workers and agency workers.
- 1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. Personnel responsible for the policy

- 2.1 The Advisory Board members have overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.
- 2.2 The Register Advisory Board has day-to-day operational responsibility for this policy, and must ensure that all managers and other staff who may deal with concerns or investigations under this policy receive regular and appropriate training.



- 2.3 All members and staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Members and staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Whistleblowing Officer.

3. What is Whistleblowing?

- 3.1 **Whistleblowing** is the disclosure of information which relates to suspected malpractice or wrongdoing or dangers at work (often committed by the employer or a learner's Training Centre). This may include:

- (a) criminal activity;
- (b) failure to comply with any legal, professional obligation or regulatory requirements;
- (c) miscarriages of justice;
- (d) danger to health and safety;
- (e) damage to the environment;
- (f) bribery under our Anti-corruption and Bribery Policy;
- (g) facilitating tax evasion contrary to our Anti-facilitation of tax evasion policy: Staff Handbook;
- (h) financial fraud or mismanagement;
- (i) breach of our internal policies and procedures;
- (j) conduct likely to damage our reputation or financial wellbeing;
- (k) unauthorised disclosure of confidential information;
- (l) negligence;
- (m) the deliberate concealment of any of the above matters.

- 3.2 A **whistleblower** is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a **whistleblowing concern**) you should report it under this policy.

- 3.3 This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases you should use the Grievance Procedure pursuant to our Staff Handbook or Anti-Bullying and Harassment Policy as appropriate.



3.4 Examples of a Whistleblowing concern that could be raised to the Athena Herd Foundation include possible malpractice:

- by a member of staff at the Athena Herd Foundation;
- a member of the Accredited Practitioner Register Advisory Board or someone acting under their direction;

3.5 If you are uncertain whether something is within the scope of this policy you should seek advice from the Whistleblowing Officer, whose contact details are at the end of this policy.

4. Raising a whistleblowing concern

4.1 We hope that in many cases you will be able to raise any concerns with a member of the Advisory Board. You may tell them in person or put the matter in writing if you prefer.

4.2 We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

4.3 We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

5. Confidentiality

5.1 We hope that members and staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

5.2 We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowing Officer or one of the other contact points listed in paragraph 4 and appropriate measures can then be taken to preserve confidentiality. If you are in any



doubt you can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

6. Investigation and outcome

- 6.1 Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.
- 6.2 In some cases we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.
- 6.3 We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.
- 6.4 If we conclude that a Whistleblower has made false allegations maliciously, the Whistleblower will be subject to disciplinary action.

7. If you are not satisfied

- 7.1 While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.
- 7.2 The Athena Herd Foundation is able to take the necessary action to safeguard the interests of members, staff, centres in learners if malpractice, wrongdoing and poor practice is brought to its attention.
- 7.3 If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts in paragraph 4.

8. External disclosures

- 8.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

8.2 The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

8.3 Whistleblowing concerns usually relate to the conduct of our members or staff, but they may sometimes relate to the actions of a third party, such as a learner, customer, supplier or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first. You should contact one of the individuals set out in paragraph 4 for guidance.

9. Protection and support for Whistleblowers

9.1 It is understandable that Whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

9.2 Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer.

9.3 You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action. In some cases the whistleblower could have a right to sue you personally for compensation in an employment tribunal.

10. Contacts

Whistleblowing Officer [Chair of the Advisory Board]	Serena Hemmings
Protect (Independent whistleblowing charity)	Helpline: 0203 117 2520 E-mail: whistle@pcaw.co.uk Website: www.pcaw.co.uk