

WHISTLEBLOWING

WHAT IS WHISTLEBLOWING?

- 1. 1.1 A qualifying whistleblowing disclosure is a disclosure of information made in the public interest by a freelancer or staff member who has a reasonable belief that:
 - 1. 1.1.1 a criminal offence has been committed, is being committed, or is likely to be committed;
 - 2. 1.1.2 a person has failed, is failing or is likely to fail with any legal obligation;
 - 3. 1.1.3 a miscarriage of justice has occurred, is occurring or is likely to occur;
 - 4. 1.1.4 the health or safety of an individual has been, is being or is likely to be endangered;
 - 5. 1.1.5 the environment has been, is being or is likely to be damaged; or
 - 6. 1.1.6 information about one of these matters has been or is likely to be deliberately concealed.
- 2. 1.2 A disclosure made under this policy may also concern any other matter of a serious nature, such as unauthorised disclosure of confidential information, abrogation of proper academic procedures, and departures from requirements for good governance.
- 3. 1.3 Reasonable belief: It is not necessary for the freelancer or staff member to have proof that such an act is being, has been, or is likely to be, committed a reasonable belief is sufficient. The freelancer or staff member has no responsibility for investigating the matter it is Faculty Room Limited's right and responsibility to ensure that an investigation takes place.
- 4. 1.4 Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Freelancers or staff members should be watchful for illegal or unethical conduct and report anything of that nature when they become aware of it.
- 5. 1.5 An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, workers should not agree to remain silent. They should report the matter to the Directors.
- 6. 1.6 If a staff member is not sure whether or not to raise a concern, he/she should discuss the issue with the Directors or a Legal adviser.

2. HOW TO RAISE A CONCERN

2.1 Concerns should first be raised with the Directors. If the freelancer or staff member believes the Director to be involved, feels that the Director has not addressed their concern, or for any reason does not wish to approach the Director, they should notify another colleague or the other Director.

3. INVESTIGATIONS

- 3.1 Once a concern has been raised, it will be investigated as speedily as possible. It may be necessary to suspend one or more freelancers or members of staff while such investigation is being carried out. Such suspension should be carried out in accordance with reasonable expectations and Faculty Room Limited's Terms and Conditions and the Safeguarding Policies.
- 3.2 Those reported will be informed and will have fair scope to express their own views, interpretations and opinions of affairs.
- 3.3 All discussions will otherwise remain private and confidential and those involved (excluding the Whistleblower) will be updated on progress and outcomes.
- 3.4 Any findings to the detriment of individuals or the company will be available for later reference through references or legal outside checks, but only if applicable and legally fair and agreed.