

# Whistleblowing Policy

## Introduction

The aim of this policy is to encourage SEE staff to report suspected wrongdoings as soon as possible knowing that their report will be investigated and their confidentiality respected. Openness and integrity will ensure best practice when dealing with international students.

## Definitions

A whistleblower is a worker who reports a wrongdoing he has seen at work.

The wrongdoing disclosed must affect others or pose a current or future risk to them. Wrongdoing that only affects the person reporting it does not count as whistleblowing and is to be dealt with under SEE's Complaints Procedure. Wrongdoing includes criminal offences, risks to safeguarding, danger to someone's health and safety, incidents of the company breaking the law, covering up a wrongdoing. This list is non-exhaustive.

## Procedure

A suspected wrongdoing should be reported as soon as possible. The report can be made in writing or otherwise to the company director (The Director, South England Exchange Ltd., 33 Oriental Place, Brighton BN1 2LL; email: [juliet@southenglandexchange.org](mailto:juliet@southenglandexchange.org); Telephone: 07796 997780).

The whistleblower can make a report anonymously but in this case it may not always be possible to investigate sufficiently because the employer may not have all the information they need.

Alternatively, a whistleblower who comes forward can ask for confidentiality to be kept. SEE will respect this where possible.

SEE aims to respond to all reports of wrongdoing within 24 hours. The whistleblower will be contacted for more information, if his/her identity is known. The individual suspected of wrongdoing will be heard about the matter. SEE may involve third parties who witnessed an incident if the facts cannot otherwise be established beyond reasonable doubt. However, it is important to note that all reports will be treated on a need-to-know basis.

Safeguarding students will be the primary concern when investigating and reaching a decision. SEE will also take into account the gravity of the wrongdoing, the frequency and the impact on others. A decision can involve alerting the authorities, disciplinary measures, termination of employment and other actions. SEE will assess if an adaptation of internal processes can prevent similar cases in future and initiate such changes. A whistleblower will have no say in the decision SEE takes after

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investigation. The decision will be communicated to the wrongdoer. The whistleblower has a right to learn the outcome of the investigation and the decision taken, but only if in doing so SEE does not break someone else's confidence.

If the wrongdoing involves the director, the report should be made to the trustees of AEGIS (The Association for the Education and Guardianship of International Students) c/o:

Yasemin Wigglesworth - Executive Officer AEGIS; The Wheelhouse Bond's Mill Estate Bristol Road Stonehouse Gloucestershire GL10 3RF. E-mail: [info@aegisuk.net](mailto:info@aegisuk.net) Telephone: +44 (0) 1453 821293

### Record keeping

If the whistleblower is a member of staff, the report should be made using the *unusual incident form* on SEE's encrypted Zoho database. Reports received by email will be stored in the searchable email database. Reports received on paper will be stored in the company's safe. If a report is made not in writing, the director will summarise it in a written document which will be kept in the electronic file most suitable for it – e.g. host family or staff file. All records will be destroyed after 10 years.

### Other Sources of Information and Support

Whistleblowers can ask for support and advice from the following sources:

The Office of the Children's Commissioner, Sanctuary Buildings, 20 Great Smith Street, London SW1P 3BT, email: [info.request@childrenscommissioner.gov.uk](mailto:info.request@childrenscommissioner.gov.uk); Telephone: 020 7783 8330

The NSPCC, Weston House, 42 Curtain Road, London EC2A 3NH; email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk); Telephone: 020 7825 2500 and 0800 028 0285

Whistleblowing charity "Protect" (contact: [whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk); Telephone: 020 3117 2520), [pcaw.co.uk](http://pcaw.co.uk)

A list of similar bodies and organisations can be found here: <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies#business-finance-or-fraud>