



Whistleblowing Policy

This policy applies to all office holders and employees of the Graduate Union. It was adopted by the Board of Trustees on 11 July 2017, will be amended as appropriate to meet the demands of future legislation, and in any event, will be reviewed every two years.

The aim of this policy is to establish an internal procedure to protect and enable staff, officers and volunteers to raise concerns about perceived wrongdoing (that it is in the public interest to disclose) within the organisation, in confidence and without fear of reprisals. Whistleblowers are protected by law and should not be treated unfairly as a result of their actions.

Examples of incidents that would be included under the legal definition of whistleblowing are a criminal offence such as fraud, risk or damage to the environment, or a risk to health and safety. Concerns raised via the whistleblowing policy may also relate to the actions/behaviours of other staff or volunteers, including improper conduct or covering up wrongdoing, or about something that is perceived as unlawful, including failure to comply with internal policy (such as the organisation's safeguarding of vulnerable persons policy).

Principles

This policy is based on the following principles:

- All staff and officers have the right and responsibility to raise concerns about perceived unacceptable practice or behaviour.
- The GU will not tolerate harassment or victimisation and will take action to protect personnel when they raise a concern in good faith.
- The GU will do its best to protect a whistleblower's identity when they raise a concern and do not want their identity disclosed. However, if the concern raised needs to be addressed through another procedure, e.g. disciplinary procedure, the individual may be required to provide a signed statement as part of the evidence. In some circumstances the GU may have to disclose the identity of the worker without their consent, although this will be discussed with the worker first. There are circumstances in which the GU may be required by law to break confidentiality, for instance, if someone is believed to be at risk of imminent harm, or if terrorism is suspected.

- Appropriate advice and support will be made available to staff and officers who raise concerns.
- Those who raise concerns will be kept informed of the progress and outcome of any investigation.

In delivering on these principles, the GU's procedures for reporting and investigating whistleblowing concerns are designed to ensure that:

- Staff and officers can raise concerns internally as a matter of course, and receive feedback on any action taken.
- Concerns are taken seriously and dealt with quickly and appropriately.
- Staff and officers are reassured that they will be protected from reprisals or victimisation for whistleblowing in good faith.
- Staff and officers can take the matter further if they are dissatisfied with the setting response and seek external advice and guidance.
- Appropriate records are maintained for monitoring purposes.

Internal Procedures

Concerns should normally be raised with the whistleblower's line manager, stating as much detail about the concern as possible (including background, dates and names of individuals involved) and a reference to the fact a concern is being raised under the whistleblowing policy. If the whistleblower believes their line manager not to be an appropriate person to raise the concern with, they should approach a member of the Board of Trustees. If the whistleblower believes the Board of Trustees to be compromised in relation to their concern, they should take legal advice from a solicitor, or tell a prescribed person or body (details of such bodies are available from www.gov.uk/whistleblowing).

Once a concern has been raised under this procedure, the organisation will take action and carry out an investigation. The action taken will depend on the nature of the concern. All matters raised will be investigated internally, unless a serious conflict of interest renders this appropriate or the concern is of such a nature that external legal or HR support is deemed necessary.

If the matter is to be investigated internally, an appropriate person (either the whistleblower's line manager or a member of the Board of Trustees) will investigate the concerns in the first instance. In order to protect individuals and ensure an objective process, initial enquiries will be made to decide whether an investigation is appropriate and if so, what form it should take. Concerns or allegations that raise issues that fall within the scope of other policies/procedures will be addressed under those procedures. Some concerns may be resolved at this initial stage by agreed action or an explanation regarding the concern, without the need for further investigation.

If an investigation is required beyond the initial stage of enquiries, this must be conducted within a reasonable timeframe, and if it takes longer than ten working days, the whistleblower should receive a response that indicates progress to date, how the matter is being dealt with and the timeline within which a final response will be provided.

Conclusion and further steps

Following the conclusion of investigation, a written response will be provided within ten working days. The response should include details of how the matter was investigated, conclusions drawn from the investigation, and whom to contact should the individual be dissatisfied with the response and wish to raise the matter.

If the whistleblower is unhappy with the outcome, they should raise it with a member of the Board of Trustees, a prescribed person or body, the Advisory, Conciliation and Arbitration Service (ACAS), the whistleblowing charity Public Concern at Work, or a trade union.