

Whistleblowing Policy

Introduction

The purpose of the Whistleblowing policy is to allow any of APT's stakeholders to raise relevant disclosures without fear of victimisation or other adverse repercussions. We respect the right of persons other than our staff to raise Whistleblowing disclosures and recognise the importance of doing so in the protection of the public interest.

APT is committed to the highest standards of integrity, openness and probity. Our employment practices and stakeholder relationships foster environments that are free from wrongdoing, malpractice, or corruption. We follow the Government's published legal position on who is protected in relation to whistleblowing.

APT will protect staff, learners and third parties who disclose relevant information provided that the APT reasonably believes that disclosure:

- is made in good faith
- demonstrates that corruption, bad practice or wrongdoing has happened, is highly likely to have happened or is likely to happen
- is disclosed to an appropriate person, as outlined further in this document.

Matters raised in good faith which are subsequently realised to be unfounded will continue to be treated as made in good faith.

Definition of Whistleblowing

"Whistleblowing" is a term used when a stakeholder discloses relevant information relating to wrongdoing, bad practice, corruption, malpractice, maladministration and/or the possible covering up of these actions.

We consider examples of disclosures to comprise of, but not be limited to:

- Safeguarding concerns
- A criminal offence
- A failure to comply with legal obligations
- Where a person has committed or is likely to commit malpractice or maladministration
- Any action intended to obfuscate or deceive
- Health, safety or environmental risks
- Concealment of information relating to any of the above

Confidentiality

We will always endeavour to keep the identity of the whistleblower confidential. However, there may be occasions when it will be necessary to pass this information on to the relevant authorities.

Whistleblowing Procedure

APT staff and students would normally be expected to raise concerns in person with the Director of Business.

Disclosures that relate to APT's external stakeholders, such as apprenticeship employers, the disclosure should be made in the first instance to the Director of Business.

Safeguarding concerns should be made to either the Designated Safeguarding Officer or the Director of Business, depending on the nature of the disclosure.

Should the disclosure relate to the Director of Business, disclosures may be made to APT's Board at Peterborough Regional College.

Information APT will need regarding disclosures

In all cases we require as much information as possible in relation to disclosures, for example the details of the alleged incident, including dates and times and the names of the individual(s) involved.

We will need to understand whether other persons (e.g. other staff, learners, employers and/or Professional Bodies) may have been affected by the incident, as we may be required to inform relevant external parties, such as the police, funding and regulatory agencies.

We may need to access confidential information when we consider a disclosure. We will ensure that such information is kept secure and only used for the purposes of an investigation and in line with relevant legislation (e.g. GDPR)

We will not normally disclose the information to third parties unless required to do so

Responding to a whistleblowing disclosure

The Director of Business will:

acknowledge receipt of the notification. If your disclosure is made by phone or in person, this will be at the time of the call or discussion. If you made your disclosure in

writing, we will acknowledge in writing (which may include by email), normally within five working days of receipt of disclosure.

conduct an initial review the disclosure and any additional evidence (or confirm internally by email that another relevant staff member is doing so). The initial review will include all reasonable actions required to establish the truth and accuracy of the claims made in the disclosure. This initial review period will usually be complete within ten working days.

Following the initial review, a determination will be made by the reviewing staff member as to whether the disclosure will be accepted or rejected. Prior to making this determination, you may be asked for more evidence/information using the contact details you provided to us (if applicable). In this case, you will be informed of any potential impact on timescales. If the disclosure is accepted, you will be informed of how we will fully review the issues raised in the disclosure and of our anticipated timescales.

Where relevant, we will use staff and/or independent external parties who are independent of the matter concerned in our full review.

This review may involve us contacting the parties referenced by you. We will endeavour to maintain confidentiality during the review. We may inform external relevant parties if applicable; update them as necessary, at key stages of the review and may inform them of the final outcome, including any relevant actions or interventions. In all cases, the investigating team member will provide you with the decision of the review and an overview summary, usually via email, within 5 working days of the conclusion of the full review.

The review decision is final and there is no right of appeal against the decision. However, if the decision is based on factual inaccuracy or omission, you may then have the right to raise a complaint.

This policy has been approved and authorised by:

Name: Balwinder Gill
Position: Director of Business