

**WHISTLEBLOWING POLICY  
THE RIGHT TO RAISE CONCERNS IN THE PUBLIC INTEREST**

<b>Presented for Approval:</b>	Audit and Risk Committee 3/12/19 Policy Review Group – December 2019 Board of Governors 18/12/19 and April 2020
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	Bethan Lloyd-Jones, Governance Officer and Clerk
<b>Author:</b>	

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### Definition of Whistleblowing

*Whistleblowing can be described as the action of an individual exposing evidence of perceived wrongdoing, misconduct, unethical activity within public, private or third-sector organisations.*

*Corruption, fraud, bullying, health and safety violation, cover-ups and discrimination are common activities highlighted by whistleblowers.*

#### 1 Policy Statement

- 1.1 Coleg Cambria expects all those covered under this Policy to behave with honesty and integrity and in accordance with Coleg Cambria's Behaviours, its Code of Conduct and the values prescribed by the Committee on Standards in Public Life.
- 1.2 The College is committed to operating in an ethical, transparent and principled way and has adopted a Whistleblowing policy and procedure which supports these values and which confirms that all legitimate disclosures about malpractice or wrongdoing will be investigated in the right way.
- 1.3 The College recognises that it is in the best interest of all concerned that its culture of openness shall encourage individuals to report any legitimate issues of concern, which will ultimately lead to increased confidence in the College's commitment to improvement.

#### 2 Applicability of Policy and Procedure

- 2.1 This policy and procedure applies to individual or individuals of the College, including:

- (a) students;
- (b) apprentices;
- (c) workers which includes any casual workers; home-based casual workers; and employees of subcontractors; and
- (d) agency workers engaged by the College and
- (e) ex-employees
- (f) Corporation Board members

**The Policy shall refer to the above as *an individual or individuals*.**

- 2.2 Members of the Public are encouraged to raise genuine concerns about suspected wrongdoing by raising them with the Governance Officer and Clerk to the Corporation.

**See Appendix 2 and 3 - Guidance and Contact Details**

#### 3 Aims of the Policy

This policy aims to:

- (a) encourage *an individual or individuals* to raise genuine concerns about suspected wrongdoing at the earliest practicable stage;
- (b) encourage individual/individuals to raise those concerns through internal College procedures;
- (c) inform workers that the law allows them to raise such concerns externally and how they can do so; **Note 1**: a failure to raise a concern under this procedure may result in a disclosure losing its protected status under the law. (Refer to paragraph 5);
- (d) provide reassurance to an individual or individuals of being able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken;
- (e) identify safeguards to an individual or individuals who raise concerns about malpractice in connection with the College;
- (f) balance the need of allowing a culture of openness against the need to protect other individual or individuals against vexatious allegations or allegations which are not well-founded;
- (g) improve accountability and good governance which will lead to increased confidence in the College's commitment to improve quality;
- (h) to deter those from engaging in malpractice/wrongdoing by increasing the likelihood that they will be found out.

#### 4 Whistleblowing and Qualifying Disclosure

- 4.1 If an individual or individuals become aware of information which they reasonably believe tends to show one or more of the following, they must use this policy and procedure (In law these are referred to as Specific Subject Matter):

- (a) that a criminal offence has been committed, is being committed or is likely to be committed;
- (b) that an individual has failed, is failing or is likely to fail to comply with any legal obligation to which they are subject;
- (c) that a miscarriage of justice has occurred, is occurring, or is likely to occur;
- (d) that the health or safety of any individual has been, is being, or is likely to be, endangered;
- (e) that the environment, has been, is being, or is likely to be, damaged;
- (f) that information tending to show any of the above, is being, or is likely to be, deliberately concealed.

**See Appendix 1 – Examples of Malpractice and Wrongdoing**

- 4.2 However, attention is drawn to the fact that even if the disclosure relates to one of the specified categories stated above, it will not constitute a **qualifying disclosure** if the individual or individuals making the disclosure commits an offence by making it.

**Note 2:** a disclosure motivated by dishonesty, malice, or a predominant ulterior motive and unrelated to the policy objectives, will not be a disclosure made in accordance with this policy.

## 5 Protected Disclosure

- 5.1 The law protects an individual/individuals who, out of a sense of public duty, want to reveal suspected malpractice or wrongdoing. The law allows an individual/individuals to raise what it defines as a protected disclosure. In order to be a protected disclosure, a disclosure must:

- (a) relate to a specific subject matter (See Section 4); and
- (b) must also be made in an appropriate way (See Section 6 below); and
- (c) in the reasonable belief of the individual/individuals making it in the public interest; and
- (d) consists of information and not merely allegations of suspected malpractice i.e. conveying information in the form of facts, and identifying the situations the individual/individuals rely on as listed in paragraph 4.1.

- 5.2 Reasonable belief relates to an individual/individuals belief in the accuracy of the information about the disclosure. The focus is on what the individual/individuals in question believed rather than what anyone else might or might not have believed in the same circumstances. There must be some substantiated basis for the individual/individuals belief. Rumours, unfounded suspicions, uncorroborated allegations would not be sufficient.

## 6 Whistleblowing and other College Policies/Procedures

Making a disclosure under the Whistleblowing Policy is acting in the public interest. Therefore, in particular, personal grievances and complaints are not usually covered by whistleblowing law, and, if necessary, will be managed under other appropriate policies.

- 6.1 Whistleblowing and Grievance: A personal complaint or grievance stems from the individual/individuals in question being poorly treated and seeking personal redress. Whilst Public Concern at Work explains that a person/persons:

“... blowing the whistle is usually not directly, personally affected by the danger or illegality. Consequently, the whistle-blower rarely has a personal interest in the outcome of any investigation into their concern - they are simply trying to alert others... He or she is a messenger raising a concern so that others can address it.”

- 6.2 Whistleblowing and Fraud: The Fraud Response Plan will be triggered if a whistleblowing disclosure is linked to Fraud.

- 6.3 An individual/individuals might be unsure whether it is appropriate to raise concern under this policy. Anyone in this situation is encouraged to approach the Governance Officer and the Clerk to the Corporation, in confidence for advice.

**(See Appendix 3 - Contact**

**Details) Note 3:** The Corporation has responsibility for the Governance Officer and the Clerk, and therefore the person concerned is independent of management.

- 6.4 Whistleblowing & Safeguarding/Prevent: Any disclosures relating to the Safeguarding of Children or Vulnerable Adults or Prevent issues need to be made immediately to one of the team of staff identified within the College for such a purpose, or made directly to the Police or Social Services, under the College's Safeguarding/Prevent procedures. An individual/individuals making such a legitimate disclosure would be

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entitled to the same assurance relating to protection as detailed under this procedure. The person at the College with overall responsibility for this area is the **Student Services Manager**.

**See Appendix 3 - Contact Details**

## 7 **Who to make a Disclosure to? (See Appendix 2 for Guidance)**

The disclosure is to be made to the Governance Officer and the Clerk of the Corporation, or to the Chair of the Board, or the Chair of the Audit and Risk Committee. **Please see Appendix 3 for guidance before undertaking the contact process.**

**Note 4:** The individual/individuals making the disclosure should ensure that they have read the College's Whistleblowing Policy, and subsequently make it clear from the outset that they consider this to be a potentially *protected disclosure* and refer to Paragraph 5 of the Whistleblowing Policy.

## 8 **Anonymous Disclosure**

The individual/individuals are encouraged to identify themselves when making a disclosure. Kindly note that if an anonymous disclosure is made the College will not be in a position to notify the individual/individuals making the disclosure of the outcome of any action taken by the College. Anonymity also means that the College will have difficulty in investigating such a concern. The College reserves the right to determine whether to apply this procedure in respect of an anonymised disclosure in light of the following considerations:

- (a) the seriousness of the issues raised in the disclosure;
- (b) the credibility of the concern; and
- (c) how likely it is that the concern can be confirmed from attributable sources.

## 9 **The Investigating Process**

- 9.1 The Governance Officer and Clerk to the Corporation will be able to advise whether the concern comes within the scope of the Whistleblowing Policy or whether it should be managed through other college policies/procedures.
- 9.2 The individual/individuals making the disclosure should make it clear that it is to be a potentially *protected disclosure* (See Section 5).
- 9.3 The individual/individuals need not put anything in writing at the early stage but the details of the concern(s) raised at a meeting will be recorded, but initially will not include a record of the individual/individuals name(s) if so requested.

**See Appendix 4 - Recording a Concern Raised**

- 9.4 If the individual/individuals feel uneasy about raising a concern, then a colleague can come along to any meeting arranged.
- 9.5 Normally, within 5 working days of the initial meeting, a copy of the record of the meeting will be sent to the individual/individuals concerned.
- 9.6 The person who has recorded the disclosure will then determine whether or not the disclosure is wholly without substance or merit. If it is considered that the disclosure does not have sufficient merit to warrant further action, the whistleblower will be notified in writing of the reason(s) for the decision, and advised that no further action will be taken under this policy and procedure. Considerations to be taken into account when making this determination may include the following:
- (a) If the person who the information was disclosed to is satisfied that the individual/individual do not have a reasonable belief that suspected malpractice is occurring; or
  - (b) If the matter is already the subject of legal proceedings or appropriate action by an external body; or
  - (c) if the matter is already subject to another appropriate College procedure.

**Note 5:** The Governance Officer and the Clerk will need to be consulted at this point.

**See Appendix 5 - Summary of Review and/or Findings and Outcome of Investigation**

- 9.7 When the individual/individuals makes a disclosure which has sufficient substance or merits warranting further action, appropriate action will be undertaken (including action under any other applicable College policy or procedure). Possible actions could include:
- (a) an internal investigation;
  - (b) referral to the College's independent auditors; or
  - (c) referral to relevant external bodies such as the police, ESTYN, Health and Safety Executive or the Information Commissioner's Office.
- 9.8 If the concerns come within the scope of these procedures, the Governance Officer and the Clerk will arrange for a meeting of a committee of the Corporation entitled, the Audit and Risk Committee to consider the matter. This meeting will normally be held within 10 working days of the initial meeting between the whistleblower(s) concerned and the person who recorded the disclosure.
- 9.9 The Committee will meet and consider the concern and if/how the matter should be investigated and whether or not the police or other relevant authorities should be involved. Legal advice may be obtained at this stage.
- 9.10 If appropriate, any internal investigation would be conducted by a person agreed by the Audit and Risk Committee and should be a person without any direct association with the individual/individuals to whom the disclosure relates. The investigator could be a College manager or an external investigator appointed by the Committee.
- Note 6 Association of Colleges Guidance:** depending on the seriousness of the concern raised and the seniority of the worker making the disclosure it would be appropriate for a member of the Board, OR the Governance Officer and the Clerk of the Corporation OR a senior manager to undertake the investigation.
- 9.11 The investigator will report the findings to the Audit and Risk Committee which will then decide what action (if any) should be taken. Action could include the instigation of the College's other policies e.g. Disciplinary procedures.
- 9.12 The Committee will report on any such concerns/ complaints received and recommendation(s) to the Corporation.
- 9.13 Any recommendations for further action made will be addressed to the Chief Executive Officer or Chair of the College's Corporation as appropriate in the circumstances. The recipient will take all steps within their power to ensure the recommendations are implemented unless there are good reasons for not doing so. The outworking of the recommendations will be monitored by the Audit and Risk Committee and reported to the Corporation Board.
- 9.14 The whistleblower(s) making the disclosure will be notified of the outcome of any action taken under this policy and procedure within 20 working days, normally by the Governance Officer and the Clerk.
- 9.15 In order to ensure an expeditious investigation of the disclosure, a timeframe for the different stages of the procedure will be agreed with the worker concerned. All effort will be made to adhere to the timelines, however, they should be flexible and take into account the different types of concerns that will require varying time for investigations.
- 9.16 All communications with the whistleblower making the disclosure should be in writing and sent to their home address rather than through the College's internal mail. If investigations into the concern are prolonged, the College should keep the individual/individuals concerned updated as to the progress of the investigation and an estimated timeframe for its conclusion. Every effort should be made to ensure that the worker is kept informed.
- 10 Appeal Process**
- If the whistleblower(s) are not satisfied that their concern has been appropriately addressed, advice about the appeal process will be provided by the Governance Officer and the Clerk.

## **11 Safeguards for Workers Making a Disclosure**

### **11.1 Confidentiality:**

The individual/individuals making a disclosure under this procedure can expect the matter to be treated confidentially by the College and this will not be disclosed to anyone implicated in the suspected wrongdoing, without their prior approval.

11.2 The College will take all reasonable steps to ensure that any report of recommendations, or other relevant documentation, produced by the College does not identify the worker making the disclosure without written consent, or

(a) unless the College is legally obliged to do so, or

(b) for the purposes of seeking legal advice.

11.3 If the individual/individuals successfully prove that a qualifying disclosure was made, protection will be provided by the whistleblowing legislation (i.e. protected from suffering an unlawful detriment or dismissal) if the disclosure is made in a way prescribed by the law.

11.4 The individual/individuals will not suffer dismissal or any detrimental action or omission of any type (including informal pressure or any form of victimisation) by the College for making a disclosure in accordance with this policy and procedure. Equally, where a worker is threatened, bullied, pressurised or victimised for making a disclosure, disciplinary action will be taken by the College against those concerned.

## **12 Unfounded Accusations**

However, this policy and procedure does not prevent the College from bringing disciplinary action (up to and including dismissal) against the individual/individuals where the College has grounds to believe that a disclosure was made maliciously or vexatiously, or made outside the College without reasonable grounds.

## **13 Disclosure to External Bodies**

13.1 This policy and procedure has been implemented to allow the individual/individuals to raise disclosures internally within the College. The individual/individuals have the right to make a disclosure outside of the College where there are reasonable grounds to do so and in accordance with the law.

13.2 The individual/individuals may make a disclosure to an appropriate external body prescribed by the law. This list of 'prescribed' organisations and bodies can be found in information on the GOV.UK website.

13.3 The individual/individuals can also make disclosures on a confidential basis to a practising solicitor/barrister.

13.4 If the individual/individuals seeks advice outside of the College, care must be taken not to breach any confidentiality obligations or damage the College's reputation in so doing.

## **14 Accountability and Monitoring**

A record of all concerns raised under this policy and procedure will be undertaken, including cases where the College deems that there was no case to answer and therefore that no action should be taken, as well as those concerns which were referred to be addressed via other college policies. A report will be presented to the Corporation Board via the Audit and Risk Committee on an annual basis with respect to all concerns raised and their outcomes.

## **15 Further Assistance for Whistleblower(s)**

15.1 The College will not tolerate any harassment or victimisation of a whistleblower/whistleblowers. If, at any stage of this procedure the individual/individuals believe that they are being subject to informal pressures, bullying or harassment due to making a disclosure, they should raise this matter, in writing, to the Chief Executive Officer or the Chair of the Corporation as appropriate.

15.2 The whistleblower(s) may want to confidentially request counselling or other support from the College's occupational health service. Any such request for counselling or support services should be addressed to the Governance Officer and the Clerk who will liaise with the HR Department. Such a request would be made in confidence.

15.3 The whistleblower(s) can also contact the charity Public Concern at Work for confidential advice on whistleblowing issues in the Whistleblowing Advice Line.

**See Appendix 3 - Contact Details**

**16 Awareness and Training**

Employees will be made aware of this policy upon commencement with the College by the Human Resources Department. Copies can also be viewed on the intranet or obtained from the Governance Officer and Clerk.

**See Appendix 3 - Contact Details**

**Equality**

**17** Coleg Cambria recognises the diversity of its workforce. The aim is therefore, to provide a safe environment where all employees are treated fairly and equally and with dignity and respect. The College recognises that the promotion of equality and human rights is central to its work both as a provider of healthcare and as an employer. This policy and procedure has been impact assessed to ensure that it promotes equality and human rights.

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**Data Protection Act 2018 and EU General Data Protection Regulation**

All documents generated under this policy that relate to identifiable individuals are to be treated as confidential documents, in accordance with the College's Data Protection Policy and the relevant data protection legislation.

**Freedom of Information Act 2000**

The College's records and documents, apart from certain limited exemptions, can be subject to disclosure under the Freedom of Information Act. Records and documents exempt from disclosure would, under most circumstances, include those relating to identifiable individuals arising in a personnel or staff development context.

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**Note 7: This policy is based on a template from the Association of Colleges Whistleblowing**

**Guidance for Colleges.** <https://www.aoc.co.uk/sites/default/files/Whistleblowing.pdf>

**EXAMPLES OF MALPRACTICE/WRONGDOING**

A concern does not relate to unacceptable behaviour or issues of personal grievance, nor the handling of the disciplinary process with regard to workers or students, **but relate to such issues as bribery, fraud, maladministration, unethical activities or acts of a criminal nature or Safeguarding matters**. A list of more detailed examples of issues which would fall within the remit of this policy is given below. However, this list should not be viewed as exhaustive.

The disclosure of information which relates to suspected wrongdoing or dangers relating to the running of the College or to the work-related activities of workers which may include information relating to:

- (a) criminal activity;
- (b) miscarriages of justice;
- (c) danger to health and safety;
- (d) damage to the environment;
- (e) failure to comply with any legal obligation or regulatory requirements;
- (f) bribery; and/or fraud;
- (g) administrative malpractice (financial or non-financial);
- (h) academic or professional malpractice (including, for instance, violation of intellectual property rights or failure of integrity in research);
- (i) improper conduct or unethical behaviour;
- (j) unauthorised disclosure of confidential information;
- (k) suppression or concealment of any of the above matters

**1. GENERAL**

These may include situations where:

- \* a member of staff persistently departs from the established procedures contained in any of the College's policies or procedures;
- \* a member of staff is required to act in any way which:
  - (a) is illegal, improper or unethical
  - (b) is in breach of constitutional convention or a relevant professional code
  - (c) is otherwise inconsistent with the College's policies and procedures;
- \* there is a failure to respond to an identified, serious threat to health and safety;
- \* there is an offer or acceptance of any inducement or bribe intended to influence a decision, policy, plan or purchasing arrangement.

**2. STAFF – STUDENT**

These may include situations where:

- \* a member of staff assisting a student to gain prior knowledge of external or internal examinations:
  - (a) by making the contents known to students, or
  - (b) by making opportunities for students to discover prior knowledge, or
  - (c) by letting students take advantage of an unforeseen opportunity to discover that prior knowledge:
- \* a member of staff solicits or accepts an inducement from a student in return for the award of higher results or grades in coursework, assignments, and examinations to the student. This could be monetary, in kind or sexual.

**3. STAFF – EMPLOYER**

These situations may include where:

- \* a member of staff takes advantage of his/ her position and/ or access to information in order to enable himself/ herself to compete with the employer for clients or to compete in the future with the employer for clients:
- \* a member of staff gains an undisclosed profit from:
  - (a) performance of services for which remuneration, fees, emoluments, salary, wages or other payment has already been made by the employer;
  - (b) the securing of a contract of any kind on behalf of the College, whether securing of contracts is part of the member of staff's normal duties or not;
  - (c) the submission of false invoices, orders, bills and the like, either to the College's own Finance Department or an external supplier of goods or services;
- \* a member of staff persistently, without management permission, uses College property for his/ her own private concerns;
- \* member of staff, by any means, threatens or appears to threaten the independence of a governor or governors.

**4. EMPLOYER – STAFF**

These may include situations where:

- \* a member of staff, with line management responsibility, persistently overlooks or fails to deal appropriately with breaches of College procedures, policies and/ or code of ethics by other members of staff:
  - \* a member of staff with line management responsibility or timetabling responsibility persistently, without justification,
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- \* adopts a pattern of conduct towards another member of staff, where that pattern departs from existing College procedures, policies or schemes with respect to any of the matters contained in the following non-exhaustive list:
    - (a) arranging for staff training or development or for particular staff training or development;
    - (b) reducing allocated workloads;
    - (c) the allocation to or away from particular duties selected by the member of staff;
    - (d) the provision of resources and
    - (e) other similar matters.
  - \* a member of the College management team persistently fails adequately to respond to legitimate concerns raised by workers by failing to adhere to the procedures laid down in the College Grievance Procedures.

WHO TO MAKE A WHISTLEBLOWING DISCLOSURE TO?

DISCLOSURE BY INDIVIDUAL(S) WITHIN THE COLLEGE	DISCLOSURE BY THE PUBLIC		
<p style="text-align: center;">Disclosure to be raised with the Governance Officer and the Clerk to the  Corporation OR</p> <p style="text-align: center;">IF there is substantive reason why the disclosure can't be raised with the Governance Officer and the Clerk to the Corporation Disclosure to be raised with one of the  following</p> <p style="text-align: center;">Chair of the Corporation OR Chair of the Audit and Risk Committee (See Appendix 3 for contact details)</p> <p style="text-align: center;">IF disclosure <u>relates</u> to the Corporation or a member of the Corporation</p> <p style="text-align: center;">Disclosure to be raised with the  the Governance Officer and the Clerk to the  Corporation OR</p> <p style="text-align: center;">Internal or External Auditors or the Welsh Government (See Appendix 3 for contact details)</p> <p style="text-align: center;">Please note <b><u>INDEPENDENT ADVICE CAN BE SOUGHT FROM:</u></b></p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;"> <p><b>Public Concern at Work</b> Line A registered charity that provides further direction,</p> </td> <td style="width: 50%; border: none;"> <p><b>Whistleblowing Advice</b> 020 7404 6609 <a href="http://www.pcaw.org.uk">http://www.pcaw.org.uk</a></p> </td> </tr> </table>	<p><b>Public Concern at Work</b> Line A registered charity that provides further direction,</p>	<p><b>Whistleblowing Advice</b> 020 7404 6609 <a href="http://www.pcaw.org.uk">http://www.pcaw.org.uk</a></p>	<p style="text-align: center;">Contact: The Governance Officer and the Clerk</p> <p style="text-align: center;">OR</p> <p style="text-align: center;">The Chair of the Corporation</p> <p style="text-align: center;">(See Appendix 3 for contact details)</p>
<p><b>Public Concern at Work</b> Line A registered charity that provides further direction,</p>	<p><b>Whistleblowing Advice</b> 020 7404 6609 <a href="http://www.pcaw.org.uk">http://www.pcaw.org.uk</a></p>		

support and guidance in relation to whistleblowing. 3rd Floor, Union Bank Chambers 6 - 10 Borough High Street London SE1 9QQ <a href="http://www.pcaaw.co.uk">www.pcaaw.co.uk</a>	Talk to your
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**12**  
**APPENDIX 3**

**CONTACT DETAILS**

<b>Governance Officer and Clerk to the Corporation</b> Miss Bethan Lloyd-Jones Coleg Cambria Yale Site Grove Park Road LL12 7AB Email: <a href="mailto:bethan.lloyd-jones@cambria.ac.uk">bethan.lloyd-jones@cambria.ac.uk</a> Tel: 01978 26 7599	<b>Student Services Manager (with responsibility for SAFEGUARDING and PREVENT)</b> Mrs Karen Senior Coleg Cambria, Deeside CH5 4BR Email: <a href="mailto:karen.senior@cambria.ac.uk">karen.senior@cambria.ac.uk</a> Tel: 01978 26 7069
<b>Chair of the Board of Governors</b> Mr John Clutton c/o Coleg Cambria Yale Site Grove Park Road, Wrexham LL12 7AB	<b>Chair of the Audit and Risk Committee</b> Mrs Marjorie Thomson c/o Coleg Cambria Yale Site Grove Park Road, Wrexham LL12 7AB
<b>Coleg Cambria Internal Auditors:</b> KPMG LLP UK Contact details available via Governance Officer and Clerk to the Corporation	<b>Coleg Cambria External Auditors</b> RSM LLP Audit UK Contact details available via Governance Officer and Clerk to the Corporation
<b>Welsh Government</b> Senior Auditor Ty'r Afon Bedwas Road, Bedwas Caerphilly CH83 8WT 01443 663732	

**THE DESIGNATED SENIOR POST HOLDERS AT THE COLLEGE ARE:**

<b>Chief Executive Officer</b> Ms Yana Williams Coleg Cambria Yale Site Grove Park Road Wrexham, LL12 7AB Email: <a href="mailto:Yana.Williams@cambria.ac.uk">Yana.Williams@cambria.ac.uk</a> Tel: 01978 26 7100	<b>Deputy Chief Executive Operating Officer</b> Mr Steve Jackson Coleg Cambria Deeside Site Connah's Quay CH5 4BR Email: <a href="mailto:Steve.jackson@cambria.ac.uk">Steve.jackson@cambria.ac.uk</a> Tel: 01978 26 7004	<b>Deputy Chief Executive Principal</b> Mrs Sue Price Coleg Cambria Yale Site Grove Park Road Wrexham, LL12 7AB Email: <a href="mailto:sue.price1@cambria.ac.uk">sue.price1@cambria.ac.uk</a> Tel: 01978 26 7200
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**INDEPENDENT ADVICE CAN BE SOUGHT FROM:**

<b>Public Concern at Work</b> A registered charity that provides further direction, support and guidance in relation	<b>Whistleblowing Advice Line</b> 020 7404 6609
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to whistleblowing. 3rd Floor, Bank Chambers  
6 - 10 Borough High Street London SE1 9QQ  
[www.pcaw.co.uk](http://www.pcaw.co.uk)

<http://www.pcaw.org.uk> Talk to your Union

**FORM 1: Recording a disclosure raised under the Whistleblowing Policy**

<b>1</b>	<b>Concern Raised by:</b>	<b>Name:</b>
		<b>Designation:</b>
		<b>Department</b>
		<b>Contact Details:</b>
		<b>Phone:</b>
		<b>Email:</b>
		<b>Home Address</b>
<b>1.1</b>	<b>Copy of College's Whistleblowing Policy provided</b>	YES <input type="checkbox"/> NO <input type="checkbox"/>
<b>1.2</b>	<b>Is the concern raised to be a protected disclosure? (Paragraph 5 of Whistleblowing Policy)</b>	YES <input type="checkbox"/> NO <input type="checkbox"/>
<b>2</b>	<b>Concern Raised with:</b>	<b>Name</b>
	<b>See appendix 2</b>	<b>Designation</b>
		<b>Department</b>
		<b>Phone:</b>
		<b>Email:</b>
<b>3</b>	<b>Colleague/Friend accompanying</b>	<b>Name</b>
		<b>Designation</b>
		<b>Department</b>
		<b>Phone:</b>
		<b>Email:</b>
<b>4</b>	<b>Confidentiality Request See Paragraph 11 of Policy</b>	YES <input type="checkbox"/> NO <input type="checkbox"/>
<b>5</b>	<b>Concerns that Count as Whistleblowing</b>	<b>please ✓ as appropriate</b>
	(a) that a criminal offence has been committed, is being committed or is likely to be committed eg fraud, theft or corruption	
	(b) that an individual has failed, is failing or is likely to fail to comply with any legal obligation to which they are subject;	
	(c) that miscarriage of justice has occurred, is occurring, or is likely to occur;	
	(d) that the health or safety of any individual has been, is being, or is likely to be, endangered;	
	(e) that the environment, has been, is being, or is likely to be, damaged;	
	(f) that information tending to show any of the above, is being, or is likely to be, deliberately concealed.	
<b>6</b>	<b>Details of Concerns Raised (Continue overleaf if necessary)</b>	
<b>7</b>	<b>EVIDENCE to support concern: (Continue overleaf if necessary)</b>	
<b>8</b>	<b>How will matter be handled? (please ✓ as appropriate)</b>	Informal Review <input type="checkbox"/> Investigation <input type="checkbox"/>
<b>9</b>	<b>Concern Reported to:</b>	<b>Name:</b>
		<b>Designation:</b>
		<b>Department</b>
		<b>Contact Details:</b>
		<b>Phone:</b>
		<b>Email:</b>
<b>10</b>	<b>Any other comment from individual(s) raising the concern OR the person managing the discussion</b>	

**FORM 2: Disclosure raised under Whistleblowing: Summary of Review and/or Findings and Outcome of Investigation**

<b>1</b>	<b>Concern raised by:</b>	<b>Name:</b>
		<b>Designation:</b>
<b>2</b>	<b>Informal review undertaken by:</b>	<b>Name</b>
		<b>Designation:</b>
<b>3</b>	<b>Investigation undertaken by:</b>	<b>Name</b>
		<b>Designation:</b>
<b>4</b>	<b>Summary of Findings of Review/Investigation (continue overleaf if necessary)</b>	
<b>5</b>	<b>Outcome:</b>	<b>Action Taken (continue overleaf if necessary)</b>
	<b>EITHER</b>	
	<b>OR</b>	<b>No Action Taken for the following Reasons (continue overleaf if necessary)</b>
<b>6</b>	<b>Further Action (if appropriate) e.g. report the matter to the Welsh Assembly Government</b>	

Signed: Name/Designation: ..... Date: .....

N.B. Once completed this form should be retained in a case file