



Teitl: **Polisi Chwythu'r Chwiban a'r Hawl i Godi Pryderon er Budd y Cyhoedd**
Title: **Whistleblowing Policy and the Right to Raise Concerns in the Public Interest**

Dyddiad Cyhoeddi: 03/ 2014
Issue Date:

Poisi ar gyfer: Pawb yn y Coleg a'r Cyhoedd
Policy for: Everyone at the College and the Public

Cydraddoldeb ac Amrywiaeth / Equality and Diversity

Dolen at Gam 1 Asesu Effaith (ar Gydraddoldeb a'r Gymraeg): / Impact Assessment Impact Assessment Stage 1 (Equality & Welsh) link:	
Effaith ar yr Iaith Gymraeg	Welsh Language Impact
Mae asesiad effaith wedi'i gynnal ar y polisi hwn i ystyried ei effaith ar yr Iaith Gymraeg yn unol â Safonau'r Gymraeg (94-104) a Mesur yr Iaith Gymraeg (Cymru) 2011.	An impact assessment has been carried out on this policy to consider its effect on the Welsh Language in accordance with the Welsh Language Standards (94-104) and the Welsh Language (Wales) Measure 2011.

Adolygu a Chymeradwyo / Review and Approval:

Perchennog y Ddogfen: Document Owner:	Swyddog Llywodraethu a Chlerc Governance Officer and the Clerk	
Ymgynghoriad / Consultation:	Archwilwyr Mewnol - Wylie & Bisset Internal Auditors - Wylie & Bisset	
Dyddiad Cymeradwyo: Date Approved	Cymeradwyaeth y Pwyllgor Mewnol e.e. Grŵp Diogelu / Internal Committee Approval e.g. Safeguarding Group	n/a
	Pwyllgor Cyfathrebu a Diwylliant / Communications & Culture Committee:	n/a
	Pwyllgorau'r Bwrdd / Board Committees:	
	Pwyllgor Archwilio a Risg / Audit & Risk Committee:	11/21
	Pwyllgor Cwricwlwm a Safonau / Curriculum & Standards Committee	n/a
	Pwyllgor Cyllid, Pobl a Diwylliant / Finance, People & Culture Committee:	n/a
Dyddiad Adolygu: Review Date:	12/2022 Bwrdd Llywodraethol	



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	Definition of Whistleblowing
	<i>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.</i>
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 Values, its Code of Conduct and the principles 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 an individual to report any legitimate issues of concern, which will ultimately lead to increased confidence in the College's commitment to improvement.
1.4	This policy does not form part of any contract of employment and may be amended at any time.
1.5	References: (a) the reference to <i>whistleblower</i> and <i>individual</i> may also refer to the plural ie whistleblowers and individuals; (b) the reference to <i>the individual</i> primarily refers to the person or persons making the disclosure ie the whistleblower(s).
2	Applicability of Policy and Procedure
2.1	This policy and procedure applies to the Board, all of the College's employees, students and consultants, contractors as well as other workers including agency workers, casual workers, volunteers, interns and home workers.
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 to raise genuine concerns about suspected wrongdoing at the earliest practicable stage; (b) encourage an individual to raise those concerns through internal College procedures; (c) inform the individual that the law allows them to raise such concerns externally and how they can do so; (d) provide reassurance to the individual of being able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken; (e) identify safeguards to those 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 another individual 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. Note 1: please note that 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).
4	Whistleblowing and Qualifying Disclosure
4.1	This policy must be used if an individual becomes aware of information which they reasonably believe tends to show one or more of the following (In law these are referred to as <u>Specific Subject Matter</u>): (a) that a criminal offence has been committed, is being committed or is likely to be committed including those in relation to bribery and corruption and tax evasion facilitation; (b) that an individual has failed, is failing or is likely to fail to comply with any legal or professional obligation including those in relation to bribery and corruption and tax evasion facilitation; (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

	<p>stated above, it will not constitute a qualifying disclosure if any individual making the disclosure commits an offence by making it.</p> <p>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.</p>
5	Protected Disclosure
5.1	<p>The law protects any individual who, out of a sense of public duty, wants to reveal suspected malpractice or wrongdoing. The law allows you to raise what it defines as a protected disclosure. In order to be a protected disclosure, a disclosure <u>must</u>:</p> <ul style="list-style-type: none"> (a) relate to a specific subject matter (See Section 4); and (b) also be made in an appropriate way (See Section 6 below); and (c) in the reasonable belief of the individual making it is in the public interest (See 5.2); and (d) consist of <u>information</u> and not merely allegations of suspected malpractice ie conveying information in the form of facts, and identifying the situations the individual/individuals rely on as listed in paragraph 4.1.
5.2	<p>Reasonable belief relates to an individual's belief in the accuracy of the information about the disclosure. The focus is on what the individual 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 belief. Rumours, unfounded suspicions, uncorroborated allegations would not be sufficient.</p>
6	Whistleblowing and other College Policies/Procedures
	<p>Making a disclosure under the Whistleblowing Policy is acting in the public interest. Therefore, personal grievances and complaints are not usually covered by whistleblowing law, and, if necessary, will be managed under other appropriate policies.</p>
6.1	<p>Whistleblowing and Grievance: There is a difference between whistleblowing and raising a grievance:</p> <ul style="list-style-type: none"> (a) whistleblowing is where an individual has a concern about a danger or illegality that has a public interest aspect to it, eg because it threatens students, third parties or the public generally; but (b) a grievance is a complaint that generally relates to an individual's own employment position or personal circumstances at work. This policy does not set out the procedure that applies to general grievances. A complaint about personal circumstances should be raised under the College's Grievance Procedure in the first instance.
6.2	<p>Whistleblowing and Fraud: The College has an Anti-Fraud Policy and a Fraud Response Plan which will be triggered if a whistleblowing disclosure is linked to Fraud.</p>
6.3	<p>Whistleblowing & Safeguarding/Prevent: Any disclosures relating to the Safeguarding of Children or Vulnerable Adults or Prevent issues need to be made immediately to 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 Policy and procedures. An individual making such a legitimate disclosure would be 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 Cath Sullivan, Vice Principal People Experiences and Culture.</p> <p style="text-align: right;">See Appendix 3 - Contact Details</p>
	<p>6.4 If there is uncertainty whether it is appropriate to raise concern under this policy</p> <p style="text-align: right;">See Appendix 3 - Contact Details</p>
6.4	<p>If there is uncertainty whether it is appropriate to raise concern under this policy please approach the Governance Officer and the Clerk to the Corporation, in confidence for advice.</p> <p style="text-align: right;">(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.</p>
7	The Procedure: Who to make a Disclosure to? (See Appendix 2 for Guidance)
7.1	<p>The College is committed to ensuring that all disclosures raised will be dealt with appropriately, consistently, fairly and professionally. The disclosure is to be made to:</p> <ul style="list-style-type: none"> (a) the Governance Officer and the Clerk of the Corporation, or (b) to the Chair of the Board, or (c) to the Chair of the Audit and Risk Committee. <p style="text-align: center;">Please see Appendix 3 for guidance before undertaking the contact process.</p>
7.2	<p>A concern can be raised by telephone, in person or in writing. It is preferable if it is made in writing. The individual is not expected generally to prove the truth of the concern beyond doubt or provide evidence. Generally information provided, as a minimum, would be the details of the nature of the concern and why the individual making the disclosure believes it to be true, and the background and history of the concern (giving relevant dates where possible).</p>

7.3	<p>The individual may wish to consider discussing the concern with a colleague or trade union supporter before raising it formally under this policy but remember once a concern is raised formally (alone or with a colleague), in the interests of everyone involved, this is a confidential process.</p> <p>Note 4: The individual 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 <i>protected disclosure</i> and refer to Paragraph 5 of the Whistleblowing Policy.</p>
8	<p>Anonymous Disclosure</p> <p>The individual making the disclosure is encouraged to identify oneself 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 of the outcome of any action taken by the College. Anonymity also means that we 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:</p> <ul style="list-style-type: none"> (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 with the possibility of gaining additional information from them.
9	<p>The Investigating Process</p> <p>9.1 A meeting will be arranged as soon as possible to discuss the concern raised. The individual may bring a colleague or trade union supporter to any meeting that takes place. The companion must respect the confidentiality of the disclosure and any subsequent investigation. We may ask you for further information about the concern raised, either at this meeting or at a later stage.</p> <p>9.2 The individual need not put anything in writing at the early stage, but it would be preferable. The discussion at the meeting relating to the concern(s) raised will be recorded, but initially will not include a record of the name of the individual if so requested. The individual should make it clear that it is to be a potentially <i>protected disclosure</i> (See Section 5).</p> <p style="text-align: right;">See Appendix 4 - Recording a Concern Raised</p> <p>9.3 After the meeting, within 5 working days of the initial meeting, a copy of the record of the meeting will be sent to the individual who made the disclosure.</p> <p>9.4 After the meeting also, a decision will be made as to how to respond to the concern raised and this will usually involve making internal enquiries first but it may be necessary to carry out an informal investigation. During this process consideration will be made to 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 individual 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:</p> <ul style="list-style-type: none"> (a) If the person who the information was disclosed to is satisfied that the individual does 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. <p>Note 5: The Governance Officer and the Clerk will need to be consulted at this point.</p> <p style="text-align: right;">See Appendix 5 - Summary of Review and/or Findings and Outcome of Investigation</p>
9.5	<p>When it is determined that the disclosure has sufficient substance or merits warranting further action, appropriate processes will be undertaken (including action under any other applicable College policy or procedure). Possible actions could include:</p> <ul style="list-style-type: none"> (a) a formal internal investigation (via the College's Audit and Risk Committee) (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.
9.6	<p>If the concerns come within the scope of this policy, 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 individual concerned and the person who recorded the disclosure.</p>
9.7	<p>The Committee will meet and consider the concern and decide if or 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.</p>
9.8	<p>If appropriate, any internal investigation would be conducted by a person agreed by the Audit and Risk</p>

	Committee and should be a person without any direct association with the individual to whom the disclosure relates. The investigator could be a senior College manager or an external investigator appointed by the Committee as appropriate. In some cases the Committee may appoint a team of investigators including someone with relevant experience of investigations or specialist knowledge of the subject matter eg from the College's independent auditors.
9.9	The investigator/team of investigators 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 eg Disciplinary procedures.
9.10	The Committee will report on any such concerns/complaints received and recommendation(s) to the Corporation.
9.11	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.
9.12	The individual who made 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.
9.13	In order to ensure an expeditious investigation of the disclosure, a timeframe for the different stages of the procedure will be agreed with the individual 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.
9.14	All communications with the individual 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 will keep the individual updated as to the progress of the investigation and an estimated timeframe for its conclusion. Every effort should be made to ensure that the individual is kept informed.
10	Appeal Process If the individual is 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 Individuals Making a Disclosure and Confidentiality The College is committed to good practice and high values and standards and to being supportive to the individuals who raise genuine concerns under this policy, even if they turn out to be mistaken.
11.1	Confidentiality: The individual who makes the disclosure under this procedure can expect the matter to be treated confidentially by the College and where applicable, their name will not be disclosed to anyone implicated in the suspected wrongdoing, <u>without their prior approval</u> . Every effort will be made not to release the identity of the individual if that is their wish.
11.1.2	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 individual without written consent, or (a) unless the College is legally obliged to do so, or (b) for the purposes of seeking legal advice.
11.2	The individual 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. The College will not tolerate any harassment or victimisation of the individual concerned. If, at any stage of this procedure this individual believes that they are being subject to informal pressures, bullying or harassment due to making a disclosure under this policy and procedure, they should raise this matter, in writing, to the Chief Executive Officer or the Chair of the Corporation as appropriate.
11.2.1	Where an individual is threatened, bullied, pressurised or victimised for making a disclosure, disciplinary action will be taken by the College against those concerned. Any person involved in such conduct may be subject to disciplinary action and in some cases will be liable to a claim for compensation brought against them personally
11.3	Unfounded Accusations: However, this policy and procedure do not prevent the College from bringing disciplinary action (up to and including dismissal) against the individual who made the disclosure where the College has grounds to believe that a disclosure was made maliciously or vexatiously, or made outside the College without reasonable grounds.
11.4	The individual who made the disclosure may want to confidentially request counselling or other support from the College's occupational health service. Any such requests for counselling or support services should be addressed to the Governance Officer and the Clerk who will liaise with the People Experience and Culture Directorate. Such a request would be made in confidence.
12	Disclosure to External Bodies
12.1	This policy and procedure has been implemented to allow an individual to raise disclosures internally within

	<p>the College. We would expect that in almost all cases raising concerns internally would be the most appropriate course of action. If for whatever reason, the individual cannot raise concerns internally and reasonably believe this information and any allegations are substantially true, the law recognises that it may be appropriate for the individual to raise the matter with another prescribed person (eg Estyn/Ofsted, Welsh Government) or professional body or an AM/MP. A list of the relevant prescribed people and bodies for this purpose and the areas for which they are responsible is available from Protect (formerly known as Public Concern at Work) (see Clause 10)</p>		
12.2	<p>We strongly encourage any individual to seek appropriate advice before reporting a concern to anyone external. Protect is a leading independent charity whose main objectives are to promote compliance with the law and good practice in the public, private and voluntary sectors. They are a source of further information and advice and operate a confidential helpline. There is further information and contacts, below. (Appendix 3). Please note that if an individual 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.</p>		
13	<p>Accountability and Monitoring</p> <p>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.</p>		
14	<p>Awareness and Training</p> <p>Employees will be made aware of this policy upon commencement with the College by the People Experience and Culture Directorate. Copies can also be viewed on the intranet or obtained from the Governance Officer and Clerk.</p> <p style="text-align: right;">See Appendix 3 - Contact Details</p>		
15	<p>Equality</p> <p>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 has been impact assessed to ensure that it promotes equality and human rights.</p>		
16	<p>Data Protection Act 2018 and EU General Data Protection Regulation</p> <p>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.</p>		
17	<p>Freedom of Information Act 2000</p> <p>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.</p>		
18	<p>Related Policies/Procedures/Codes and Relevant Legislation</p> <table style="width: 100%; border: none;"> <tr> <td style="vertical-align: top; width: 50%;"> <ul style="list-style-type: none"> Anti-Fraud Policy and the Fraud Response Plan Bribery Act 2010 Anti-Bribery Policy Communications Act 2003 Code of Conduct (Staff and Governors) Data Protection Act 2018 and the General and Data Protection Regulation (GDPR) Complaints Policy Disciplinary Procedure Defamation Act 2013 </td> <td style="vertical-align: top; width: 50%;"> <ul style="list-style-type: none"> Financial Regulations Employment Rights Act 1996 Grievance Procedure Enterprise and Regulatory Reform Act 2013 Safeguarding and Prevent Policy Equality Act 2010 Freedom of Information Act 2000 Human Rights Act 1998 Protection from Harassment Act 1997 </td> </tr> </table>	<ul style="list-style-type: none"> Anti-Fraud Policy and the Fraud Response Plan Bribery Act 2010 Anti-Bribery Policy Communications Act 2003 Code of Conduct (Staff and Governors) Data Protection Act 2018 and the General and Data Protection Regulation (GDPR) Complaints Policy Disciplinary Procedure Defamation Act 2013 	<ul style="list-style-type: none"> Financial Regulations Employment Rights Act 1996 Grievance Procedure Enterprise and Regulatory Reform Act 2013 Safeguarding and Prevent Policy Equality Act 2010 Freedom of Information Act 2000 Human Rights Act 1998 Protection from Harassment Act 1997
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EXAMPLES OF MALPRACTICE/WRONGDOING

A list of examples of issues which would fall within the remit of this policy is given below. However, this list should not be viewed as exhaustive:

- (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; bullying;
- (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;
- * a 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,
 - * 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</p> <p style="text-align: center;">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</p> <p style="text-align: center;">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</p> <p style="text-align: center;">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 <u>INDEPENDENT ADVICE CAN BE SOUGHT FROM:</u> <u>Protect:</u> The charity provides confidential advice to would-be whistleblowers who are concerned about making a disclosure. 020 3117 2520</p> <p style="text-align: center;"><u>or contact your Union</u></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>

CONTACT DETAILS

Governance Officer and Clerk to the Corporation Miss Bethan Lloyd-Jones Email: bethan.lloyd-jones@Cambria.ac.uk Tel: 01978 26 79 43	Deputy Chief Executive People Experiences and Culture with overall responsibility for Safeguarding and Prevent Ms Cath Sullivan Coleg Cambria Deeside Site Connah's Quay CH5 4BR Email: Cath.Sullivan@Cambria.ac.uk Tel: 07971 72 6225
Chair of the Board of Governors Professor Tim Wheeler DL c/o Coleg Cambria Yale Site Grove Park Road, Wrexham LL12 7AB	Chair of the Audit and Risk Committee Ms Jill Jones c/o Coleg Cambria Yale Site Grove Park Road, Wrexham LL12 7AB
Coleg Cambria Internal Auditors Wylie Bisset LLP Contact details available via Governance Officer and Clerk to the Corporation: bethan.lloyd-jones@Cambria.ac.uk	Coleg Cambria External Auditors Haines Watts Birmingham LLP Contact details available via Governance Officer and Clerk to the Corporation: bethan.lloyd-jones@Cambria.ac.uk
Welsh Government <u>Auditor General:</u> Write to: PIDA Officer The Auditor General for Wales 24 Cathedral Road, Cardiff CF11 9LJ E-mail: whistleblowing@audit.wales Tel: 02920 320522	INDEPENDENT ADVICE CAN BE SOUGHT FROM: <u>Protect - Whistleblowing Advice Line</u> The charity provides confidential advice to would-be whistleblowers who are concerned about making a disclosure. Free, confidential whistleblowing advice Tel: 020 3117 2520

THE DESIGNATED SENIOR POST HOLDERS AT THE COLLEGE ARE:

Chief Executive Officer Ms Yana Williams Coleg Cambria Yale Site Grove Park Road, Wrexham, LL12 7AB Email: Yana.Williams@Cambria.ac.uk Tel: 01978 26 7100	Deputy Chief Executive Chief Operating Officer Mr Steve Jackson Coleg Cambria Deeside Site Connah's Quay CH5 4BR Email: Steve.jackson@Cambria.ac.uk Tel: 01978 26 7004
Deputy Chief Executive Principal Mrs Sue Price Coleg Cambria Yale Site Grove Park Road Wrexham, LL12 7AB Email: sue.price1@Cambria.ac.uk Tel: 01978 26 7200	Deputy Chief Executive People Experiences and Culture with overall responsibility for Safeguarding and Prevent Ms Cath Sullivan Coleg Cambria Deeside Site Connah's Quay CH5 4BR Email: Cath.Sullivan@Cambria.ac.uk Tel: 07971 72 6225

Or contact your Union

APPENDIX 4

FORM 1: Recording a disclosure raised under the Whistleblowing Policy

1	Concern Raised by:	Name:
		Designation:
		Department
		Contact Details:
		Phone:
		Email:
		Home Address
1.1	Copy of College's Whistleblowing Policy provided	YES <input type="checkbox"/> NO <input type="checkbox"/>
1.2	Is the concern raised to be a protected disclosure? (Paragraph 5 of Whistleblowing Policy)	YES <input type="checkbox"/> NO <input type="checkbox"/>
2	Concern Raised with:	Name
	See appendix 2	Designation
		Department
		Phone:
		Email:
3	Colleague/Friend accompanying	Name
		Designation
		Department
		Phone:
		Email:
4	Confidentiality Request See Paragraph 11 of Policy	YES <input type="checkbox"/> NO <input type="checkbox"/>
5	Concerns that Count as Whistleblowing	please <input checked="" type="checkbox"/> as appropriate
	(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.	
6	Details of Concerns Raised (Continue overleaf if necessary)	
7	EVIDENCE to support concern: (Continue overleaf if necessary)	
8	How will matter be handled? (please <input checked="" type="checkbox"/> as appropriate)	Informal Review <input type="checkbox"/> Investigation <input type="checkbox"/>
9	Concern Reported to:	Name:
		Designation:
		Department
		Contact Details:
		Phone:
		Email:
10	Any other comment from individual(s) raising the concern OR the person managing the discussion	

APPENDIX 5

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

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

Signed: Name/Designation: Date:

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