



## **ALPHA PLUS GUARDIANS LTD Whistleblowing Policy**

### **1**

ALPHA PLUS GUARDIANS LTD is committed to the highest standards of transparency, integrity and accountability in its inspection and accreditation work and the sharing of best practice in guardianship of international students. Concerns about poor practice within ALPHA PLUS GUARDIANS LTD or its inspection process should usually be dealt with through the ALPHA PLUS GUARDIANS LTD complaints procedure, found on the ALPHA PLUS GUARDIANS LTD website. However serious allegations may be raised by following the whistleblowing policy. It is the duty of all members of ALPHA PLUS GUARDIANS LTD and those associated with ALPHA PLUS GUARDIANS LTD, to raise any concerns so that improvements can be made. Raising concerns will not result in reprisals in any form.

This policy is intended to provide a means of making serious allegations about standards, conduct, financial irregularity or possible unlawful action in a way that will ensure confidentiality and protect those making such allegations in the reasonable belief that it is in the public interest to do so from being victimised, discriminated against or disadvantaged.

This policy does not replace other policies and procedures such as the ALPHA PLUS GUARDIANS LTD Grievance Procedure and ALPHA PLUS GUARDIANS LTD Complaints Procedure.

This procedure applies to all ALPHA PLUS GUARDIANS LTD employees, and includes associates, contractors, and member organisations/schools.

If an employee has a concern about the conduct of a fellow employee in the working environment (e.g. that they are not treating colleagues with respect) they should raise this with the Directors of ALPHA PLUS GUARDIANS LTD.

This procedure applies to, but is not limited to, allegations about any of the following:

- Conduct which is an offence or breach of the law
- Alleged miscarriage of justice
- Serious Health and Safety risks
- The unauthorised use of public funds
- Possible fraud and corruption
- Sexual, physical or verbal abuse, or bullying or intimidation of employees, customers or

service users

- Abuse of authority
- Other unethical conduct

## **Reporting**

ALPHA PLUS GUARDIANS LTD recognises that the decision to make an allegation can be a difficult one to make. However, whistle-blowers who make serious allegations in the reasonable belief that it is in the public interest to do so have nothing to fear because they are doing their duty to those for whom ALPHA PLUS GUARDIANS LTD is providing a service (international students).

## **2**

ALPHA PLUS GUARDIANS LTD will take appropriate action to protect a whistle-blower who makes a serious allegation in the reasonable belief that it is in the public interest to do so from any reprisals, harassment or victimisation.

## **Confidentiality**

All allegations will be treated in confidence and every effort will be made not to reveal a whistle-blower's identity unless requested by the whistle-blower.

ALPHA PLUS GUARDIANS LTD will not, without the whistle-blower's consent, disclose the identity of a whistle-blower to anyone other than a person involved in the investigation/allegation. Sometimes the whistle-blower might be asked to give a statement as part of the investigation, in which case their identity may have to be revealed.

## **Anonymous allegations**

This policy encourages whistle-blowers to put their name to an allegation wherever possible as anonymous allegations may often be difficult to substantiate/prove. Allegations made anonymously are much less powerful but anonymous allegations will be considered at the discretion of the Executive Officers/Directors of ALPHA PLUS GUARDIANS LTD.

In exercising discretion to accept an anonymous allegation the factors to be taken into account: The seriousness of the issue raised; The credibility of the allegation; and Whether the allegation can realistically be investigated from factors or sources other than the complainant

## **Untrue allegations**

No disciplinary or other action will be taken against a whistle-blower who makes an allegation in the reasonable belief that it is in the public interest to do so even if the allegation is not substantiated by an investigation. However, disciplinary action may be taken against a whistle-blower who makes an allegation without reasonable belief that it is in the public interest to do so (e.g. making an allegation frivolously, maliciously or for personal gain where there is no element of public interest).

## **Procedure for making an allegation**

1. Contact a Director/Executive Officer of Alpha Plus Guardians Ltd  
Mr Richard Ryan  
Mrs Emma Ryan  
[office@alphaplusguardians.co.uk](mailto:office@alphaplusguardians.co.uk)  
01865 428320/07981 705255

2. Contact AEGIS our accrediting body

AEGIS

[info@aegisuk.net](mailto:info@aegisuk.net)

01453 821293

3. Contact the Police

If the concern involves an immediate threat to a child's safety the Police should be contacted on 101. If the student is under 16 years of age, the Local Children Safeguarding Board should be contacted immediately.

**For further help you can contact the NSPCC helpline. They offer free advice and support to professionals with concerns about how child protection issues are being handled in their own or another organisation:**

0800 0280285

[help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## **Allegation**

Whether a written or oral report is made it is important that relevant information is provided including: <sup>2</sup> The name of the person making the allegation and a contact point. <sup>2</sup> The background and history of the allegation (giving relevant dates and names and positions of those who may be in a position to have contributed to the allegation); <sup>2</sup> The specific reason for the allegation. Although someone making an allegation will not be expected to prove the truth of any allegations, they will need to provide information to the person they have reported to, to establish that there are reasonable grounds for the allegation.

## **Action on receipt of an allegation**

The line manager will record details of the allegation gathering as much information as possible, (within 5 working days of receipt of the allegation) including:

- The record of the allegation:
- The acknowledgement of the allegation
- Any documents supplied by the whistle-blower

The investigator will ask the whistle-blower for his/her preferred means of communication and contact details and use these for all communications with the whistle-blower in order to preserve confidentiality.

If the allegation relates to fraud, potential fraud or other financial irregularity the Directors/ Executive Officers will be informed within five working days of receipt of the allegation. The Directors/Executive Officers will determine whether the allegation should be investigated and the method of investigation.

If the allegation discloses evidence of a criminal offence it will immediately be reported to the Directors/Executive Officers and a decision will be made as to whether to inform the Police or appropriate authorities.

#### Timetable

An acknowledgement of the allegation in writing within 10 working days with:

- An indication of how ALPHA PLUS GUARDIANS LTD propose to deal with the matter
- An estimate of how long it will take to provide a final response
- An indication of whether any initial enquiries have been made
- Information on whistle-blower support mechanisms
- Indication whether further investigations will take place and if not, why not

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Where the allegation has been made internally and anonymously, obviously ALPHA PLUS GUARDIANS LTD will be unable to communicate what action has been taken.

#### **Support**

ALPHA PLUS GUARDIANS LTD will take steps to minimise any difficulties which may be experienced as a result of making an allegation. For instance, if a whistle-blower is required to give evidence in criminal or disciplinary proceedings ALPHA PLUS GUARDIANS LTD will arrange for them to receive advice about the procedure and advise on the support mechanisms that are available.

ALPHA PLUS GUARDIANS LTD accepts that whistle-blowers need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform those making allegations of the outcome of any investigation.

#### **Responsibility for the procedure**

The Directors/Executive Officers have overall responsibility for the operation of this procedure and for determining the administrative processes to be followed and the format of the records to be kept.

#### **Monitoring**

- A Register will record the following details:
- The name and status (e.g. employee) of the whistle-blower
- The date on which the allegation was received
- The nature of the allegation
- Details of the person who received the allegation
- Whether the allegation is to be investigated and, if yes, by whom
- The outcome of the investigation
- Any other relevant details

The Register will be confidential and only available for inspection by The Directors/Executive Officers.

The Directors/Executive Officers will report annually on the operation of the Procedure and on the whistleblowing, allegations made during the period covered by the report. The report will be in a form which does not identify whistle-blowers.

Further information and advice can be found here: <https://www.gov.uk/whistleblowing>

**Contact details**

The Directors/Executive Officers:

Mrs Emma Ryan

email: [office@alphaplusguardians.co.uk](mailto:office@alphaplusguardians.co.uk)

Mr Richard Ryan

email: [office@alphaplusguardians.co.uk](mailto:office@alphaplusguardians.co.uk)

Next review date: 30th September 2019