

Appendix E – Whistleblowing Policy and Procedure

1. Statement of Policy

As a subsidiary of a registered charity, EtonX is committed to maintaining high stands of honesty, openness and accountability. EtonX recognises that their members of staff have an important role in achieving this goal.

If you, as a member of staff, become aware of the fact that another staff member is engaging in illegal or improper activity, you might feel that you are not able to voice your concerns, in fear of jeopardising their career or that this might be seen as disloyal to your colleagues or the company itself. You might also be worried about the reactions of your colleagues, or whether or not your concern will be taken seriously.

We do not believe that anyone should stay silent in the knowledge that wrongdoing is taking place. EtonX takes any instance of malpractice seriously, whether it is committed by staff members, tutors or freelancers. EtonX encourages whistle-blowing, and promises to protect any staff member who blows the whistle in good faith.

This policy sets out a procedure by which you can report your concerns to us. If you make a complaint through this procedure you are assured of protection against victimisation and/or disciplinary action by EtonX by the Public Interest Disclosure Act 1998.

2. What should I do if I have a concern about a student?

If your concern relates to the welfare, health and safety of a pupil, you should report it to the DSL immediately as it may constitute a safeguarding issue.

3. What is whistle-blowing?

Whistle-blowing is when you raise a concern about a danger, malpractice, wrongdoing or illegality which you suspect is occurring at the company. If you blow the whistle you may not have a personal interest in the outcome of any investigation but you want to raise a concern. As a result you are not expected to prove what you say but rather to raise the matter so that others can look into it.

If you personally feel that you have been poorly or inappropriately treated then you should raise a grievance under EtonX's Grievance Procedure (found in the Staff Handbook).

4. What sort of activities should I report using the Whistleblowing procedure?

It is impossible to give an exhaustive list of the activities that constitute misconduct or malpractice but, broadly speaking, we would expect you to blow the whistle if you thought any of the following might be occurring at the company:

- criminal offences
- failure to comply with legal obligations (for example charity obligations) or other malpractice
- fraud, financial impropriety or dishonesty
- actions which endanger the health or safety of staff or the public
- actions which cause damage to the environment
- abuse of EtonX property
- actions which are intended to conceal any of the above

5. How do I make a report?

You can make a report orally or in writing. We would normally expect you to raise your concerns with Tom Arbuthnott, Member of the EtonX Board (t.arbuthnott@etoncollege.org.uk).

6. How will my report be investigated?

Once you have made a report, we will acknowledge receipt of it as soon as possible and in any event within 10 working days. We will need to make preliminary enquiries to decide whether a full investigation is necessary. If such an investigation is necessary then, depending on the nature of the misconduct, your concerns will be either:

- investigated internally, or
- referred to an external person for investigation.

Subject to any legal constraints, we will inform you as soon as reasonably possible of the outcome of the enquiries and investigation and any further action that has been taken.

7. Will the Company protect my identity if I make a report?

We understand that in certain circumstances an individual might prefer to submit his or her report anonymously. If you wish to do so, that is fine. However, we would encourage you to disclose your identity because otherwise it will be difficult for the person investigating the case to access the full details and make a proper assessment. We will do everything possible to keep your report confidential, if you so wish. However, there may be circumstances (for example, if your report becomes the subject of an investigation) where you may be needed as a witness. Should this be the case we will discuss this with you at the earliest opportunity.

8. What can I do if I am unhappy with the way my report has been handled?

If you are unhappy with the outcome of an investigation, we would ask you to contact Janet Walker, the Bursar at Eton College, by emailing janet.walker@etoncollege.org.uk to discuss your concern.