

POLISH UNIVERSITY ABROAD IN LONDON

WHISTLEBLOWING POLICY

Nominated Member of Leadership Staff Responsible for the policy: (Name and role)

Date written: (Month, Year)

Date agreed by the Board of Trustees: (Month, Year)

Scope:

This policy applies to all staff members, volunteers and students of the Polish University Abroad.

Policy objectives:

1. The purpose of this policy and procedure is to outline ways in which all employees, volunteers and students can express concerns about malpractice/wrongdoing and to encourage them to raise these at an early stage and in an appropriate way in line with the Public Interest Disclosure Act 1998.
2. The Board of Trustees is committed to managing the organisation in the best way possible. This policy is in place to reassure everyone that it is safe and acceptable to speak up and enable concerns to be raised at an early stage and in the right way.
3. This policy does not apply to complaints about employment or how you have been treated. For cases such as this Anti- Bullying Policy should be used.
4. The 'Whistle Blowing' Policy and Procedure is primarily for concerns where, due to malpractice, fraud, abuse or other inappropriate acts/omissions, the interest of others or the organisation itself is at risk.
5. The policy is designed to provide a clear commitment to staff that concerns will be taken seriously, and to encourage staff to communicate their concerns through the appropriate channels.
6. The 'Whistle Blowing' Policy is intended to cover serious public interest concerns that fall outside the scope of other procedures. These, as stated in the Act are that in the reasonable belief of the employee, the following matters are either happening now, have happened, or are likely to happen:
 - A criminal offence
 - The breach of a legal obligation
 - A miscarriage of justice
 - A danger to the health and safety of an individual
 - Damage to the environment
 - Deliberate covering up of/failing to report information tending to show any of the above.

Links to legislation:

1. Employment Rights Act 1996
2. Public Interest Disclosure Act 1998

Procedure for raising a whistleblowing concern:

1. Raise your concern with (name) in the first instance. This can be in writing or in person.

2. If preferred or you consider that your concerns are extremely serious, you should write to the Board of Trustees at puno.trustees@puno.ac.uk.
3. Please explain that you are raising your concerns as part of PUNO whistleblowing policy and procedure and set all the key facts including names of those involved and all relevant dates.
4. You will be invited to a meeting at which you can discuss your concerns. You are entitled to bring someone with you to this meeting – and any subsequent meetings (this person will be asked to agree to keep strictly confidential the contents of the meeting before, during and after the meeting and any following investigations that University conducts in relation to the concerns raised).
5. The University (Disciplinary Committee or Board of Trustees) will investigate the matters and may request additional meetings or decide to involve relevant external specialists to help to conduct a thorough, fair and responsible investigation.
6. The body involved in this investigation will keep you informed about the progress of the investigation as far as they are able. For a number of reasons generally relating to legal obligations not all details of the investigation and deliberations may be shared.
7. If you find that the outcome of the investigation is not satisfactory, you are entitled to complain to the Board of Trustees and request a review.
8. Ideally the disclosure should be made to the University, however there are other ways (set in law) to make a disclosure without loss of rights under whistleblowing law. One of them is to make a disclosure to prescribed persons (regulators and professional bodies including MPs). PUNO's prescribed person is the Charity Commission.
9. Alternatively there is a possibility of approaching the media but in most such cases a whistle blower can expect to lose his/hers whistleblowing law rights.
10. If a whistle blower believes that they have been unfairly treated because of the disclosure they may decide to take their case to an employment tribunal.

PUNO's responsibilities:

The University is committed to the effective implementation of this policy and procedure. The aim of the procedure is to ensure that an appropriate process exists which supports the resolution of matters raised, in response to any disclosure of wrongdoing or irregularity and in a manner which is fair and discreet. If you raise a genuine concern under this policy, you will not be at risk of losing your job or suffering any detriment (such as reprisal or victimisation). Provided you are acting in good faith (effectively this means honestly), it does not matter if you are genuinely mistaken or if there is an innocent explanation for your concerns. This assurance is not extended to those who maliciously raise a matter they know is untrue.

Signed by:

PUNO Trustees

PUNO Safeguard Lead: Katarzyna Karita,

PUNO Safeguard Deputy Lead: Jaroslaw Solecki

Authorized by: PUNO's Senat

London, 26th October 2021