AEGIS Whistleblowing Policy

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AEGIS 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. Complaints about poor practice within AEGIS including its inspection process should usually be dealt with through the AEGIS Complaints Policy, found on the AEGIS website. However, allegations may be raised by following the whistleblowing policy. It is the duty of all members of AEGIS and those associated with AEGIS, 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 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 AEGIS Complaints Policy.

This procedure applies to all AEGIS employees and trustees, and also includes 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 their line manager, or if that is not possible, with the Board of Trustees.

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

AEGIS recognises that the decision to make an allegation can be a difficult one to make. However, whistleblowers who make 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 AEGIS is providing a service (international students).

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AEGIS will take appropriate action to protect a whistleblower who makes an 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 whistleblower's identity unless requested by the whistleblower.

AEGIS will not, without the whistleblower's consent, disclose the identity of a whistleblower to anyone other than a person involved in the investigation/allegation. Sometimes the whistleblower 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 whistleblowers 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 Chair of the Trustees. This does not in itself mean that a complaint using the Complaints Policy and/or other policies will not be heard.

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 whistleblower 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 whistleblower 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

It is preferable for allegations to be made to, for example, an employee's immediate manager to whom they report. However, this may depend on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if the whistleblower believes that management is

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involved it would be inappropriate to raise it directly with them. The whistleblower may then make an allegation direct to any of the following:

- The Chair of the Trustees
- A Trustee

If either of the above receive an allegation he/she will consider the allegation and may discuss with either the Chair of the Trustees or the Board of Trustees. The line manager (or either/or both) of the above, after consideration, will discuss with the whistleblower and if they wish to proceed, the allegation will be investigated.

Annex 1 of this policy includes a whistleblowing form that should be used when reporting concerns.

Allegation

Whether a written or oral report is made it is important that relevant information is provided including:

- The name of the person making the allegation and a contact point.
- 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).
- 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.

Annex 1 of this policy includes a whistleblowing form that should be used when reporting concerns.

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 whistleblower.

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

If the allegation relates to fraud, potential fraud or other financial irregularity the Board of Trustees will be informed within 5 working days of receipt of the allegation. The Trustees will determine whether the allegation should be investigated and the method of investigation.

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If the allegation discloses evidence of a criminal offence, it will immediately be reported to the Board of Trustees 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 AEGIS 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 whistleblower support mechanisms.
- Indication whether further investigations will take place and if not, why not.

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

Support

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

AEGIS accepts that whistleblowers 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 Chief Executive Officer and Chair of the Trustees 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 whistleblower.
- The date on which the allegation was received.
- The nature of the allegation.

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- 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 Board of Trustees. The CEO will report annually to the Board of Trustees 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 whistleblowers.

Further information and advice can be found here: https://www.gov.uk/whistleblowing
The AEGIS Complaints Policy can be found here: AEGIS Complaints Policy

Contact Details

Chief Executive Officer, Yasemin Wigglesworth yasemin@aegisuk.net
Chair of the Trustees, Edward May edward@aegisuk.net

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Annex 1: Whistleblowing Form

Confidential

1. **Your Details (Optional – you may report anonymously)**
    - Name: _____
    - Position/Role: _____
    - Contact Email/Phone: _____
2. **Details of Concern**
    - Date of Incident/Concern: _____
    - Location (if applicable): _____
    - Name(s) of Person(s) Involved (if known): _____
    - Description of Concern:
      (Provide as much detail as possible, including what happened, when, where, and any supporting evidence)

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3. **Has this Concern Been Reported Elsewhere?**
    - Yes (Please provide details): _____
    - No
4. **Do You Have Any Supporting Evidence?**
    - Yes (Please attach or describe): _____
    - No
5. **Do You Require Confidentiality?**
    - Yes
    - No
6. **Any Additional Comments**

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Declaration
I confirm that the information provided is accurate to the best of my knowledge.

- **Signature (if applicable): _____**
- **Date: _____**

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