

RECAO

Policy Document

Whistleblowing Policy

RECAO Whistleblowing Policy

This policy applies to individuals who do not work for RECAO, and who wish to make certain disclosures to RECAO relating to:

- the development, delivery and award of RECAO qualifications
- assessment arrangements on RECAO qualifications
- other matters likely to be of relevance or interest to RECAO in our role as an Awarding Body

This policy details RECAO's commitment to the provision of duty of care to RECAO Learners and RECAO Centres. RECAO have a positive commitment and open approach to whistleblowing. Our policy and procedure is intended to be used in line with the Public Interest Disclosure Act 1998 (PIDA). This provides protection for whistleblowing on wrongdoing. Our policy encourages Learners/Centres to raise concerns with RECAO should they feel the issue would not be addressed independently by the RECAO Centre.

If you are concerned about issues that you see or hear regarding RECAO qualifications, usually these concerns are easily resolved by following RECAO or RECAO Centre policies and procedures. However, those procedures may not appear to be appropriate where:

- there is no relevant procedure; or
- you have genuine concerns about using a particular procedure at either the outset or the end of the process; and
- your concern is about conduct likely to harm the reputation of RECAO.

It can be difficult to know what to do in this situation. You may be worried about raising such issues or you may want to keep the concerns to yourself, perhaps feeling it is not any of your business or that it is only a suspicion. However, RECAO have introduced this policy to enable you to raise genuine concerns about such matters at an early stage and in the right way. RECAO would rather you raised the matter when it is of first concern, rather than wait for proof. Please also see RECAO Malpractice and Maladministration Policy and procedure.

Scope

This policy applies to individuals who do not work for RECAO, including RECAO Centre staff.

Definition of Whistleblowing

Whistleblowing is a term used when an individual discloses information relating to suspected malpractice or wrongdoing and/or the covering up of suspected malpractice or wrongdoing. The suspected malpractice or wrongdoing is often committed by a learner or a RECAO Approved Centre, although this is not always the case.

Whistleblowing is distinct from both complaints and employment disputes.

The content of the disclosure

Disclosing a genuine concern which, in your honest, reasonable belief, is in the public interest and suggests that wrongdoing has been committed, is being committed or is likely to be committed, could qualify for protection under PIDA. Wrongdoing includes (but is not limited to):

- a criminal offence has been, is being, or is likely to be committed
- a person has failed, is failing, or is likely to fail to comply with a legal obligation
- a miscarriage of justice has occurred, is occurring, or is likely to occur
- the health and safety of an individual has been, is being, or is likely to be endangered
- the environment has been, is being, or is likely to be damaged, or
- information relating to any of the above has been, or is likely to be, deliberately concealed.

Our policy additionally covers any conduct not included above which appears likely to, or may cause harm to, the reputation of RECAO.

Whistleblowing disclosures can be made by email to through centres@rec.uk.com

What happens after the disclosure is made?

1. If you choose to make a whistleblowing disclosure to RECAO, and have provided contact details, we will send you an initial acknowledgement that we have received your disclosure.
2. We will normally ask you to provide as much of the evidence as possible that you have seen to support your disclosure.
3. We will conduct a full investigation (for further details please refer to Investigation Policy). However, it may not always be possible to investigate or substantiate anonymous disclosures.
4. We will consider each disclosure of information sensitively and carefully, and decide upon an appropriate response. We may share with third parties any information received in the disclosure where we consider it necessary to do so.
5. In most cases, we will keep you updated as to what action is being taken in response to your disclosure. We will normally send you an update within 28 working days of receiving your disclosure, but this may take longer if the issue is particularly complex.

What if I don't want to reveal my identity?

If you disclose your identity, it will be easier for us to:

- **Give you feedback**
- **Look into the matter**
- **Protect your position**

We very much hope that the assurances we give in this policy will encourage you to disclose your identity to those who need to know. However, if you wish to raise an issue anonymously, we will, of course, consider your disclosure

Confidentiality

We will always endeavour to keep a whistleblower's identity confidential where asked to do so, although we cannot guarantee this and we may need to disclose your identity to:

- the police, fraud prevention agencies or other law enforcement agencies (to investigate or prevent crime, including fraud)
- the courts (in connection with court proceedings)
- another person to whom we are required by law to disclose your identity.

A whistleblower should also recognise that he or she may be identifiable by others due to the nature or circumstances of the disclosure.

What happens after the investigation?

The RECAO will ensure, to the appropriate extent that the findings of the investigation are communicated to:

- you, as the person raising the wrongdoing concern
- the individual(s) under investigation and if appropriate, other external authorities who may need to consider whether action should be taken on the basis of the findings

Monitoring and Review

Use of this policy will be monitored annually to ensure the procedure and its approach remains fit for purpose

