

Whistleblowing Policy

Introduction

'Whistleblowing' is a term used when an individual becomes aware of or suspects an act of wrongdoing within an organisation and makes a disclosure to report their concerns in accordance with The Public Interest Disclosure Act 1998.

The Royal Academy of Engineering is committed to the highest possible standards of openness, probity and accountability. We encourage employees and others with serious concerns about any aspect of the Academy's work and services to come forward and voice those concerns.

Policy purpose and principle

This policy aims to encourage Academy employees and anyone who is connected to Academy activities to raise concerns and in the right way, to the right people, at the right time, in line with The Public Interest Disclosure Act 1998.

The Public Interest Disclosure Act offers 'whistleblowers' statutory protection from dismissal or victimisation resulting from their reporting a criminal offence, failure to comply with a legal obligation, miscarriage of justice, breach of health & safety rules, damage to the environment or the deliberate act of concealing any of the above.

Any concerns raised including concerns about abuse or qualifying disclosures under the Public Interest Disclosure Act will be investigated promptly and thoroughly.

The Academy's whistleblowing policy is intended to cover concerns that fall outside the scope of other procedures. Examples of such matters are:

- Any breach of the criminal or civil law
- Maladministration
- Breach of a statutory Code of Practice
- Breach of or a failure to implement an approved Academy policy
- Corruption or fraud
- Dangerous practices which are likely to cause physical danger to others, or a risk of significant damage to property and/or the environment
- Abuse of power or the use of the Academy's power and authority for any unauthorised or ulterior purpose
- Discrimination in the Academy's employment or its services
- Concealment of any of the above

This policy does not cover personal grievances or private disputes between staff, or between staff and the Academy, such as failure to gain promotion, industrial injury compensation, disciplinary hearings, harassment or unfair treatment. Nor does it cover general employment rights such as redundancies and changes to contracts. These are covered by separate policies within the Academy. For further guidance, please contact a member of the Academy's HR team.

Who does the policy apply to?

The policy applies to all employees and anyone connected with the Academy's activities including workers, secondees, interns, contractors and visitors.

Confidentiality

The Academy will do its best to protect an individual's identity when they raise a concern in accordance with this policy. However, to ensure a fair and thorough investigation, it may be necessary to reveal the source of the information during the process. Statements by the individual may also be required as part of the evidence.

Any associated investigation correspondence and interviews will be treated in accordance with General Data Protection Regulation (GDPR) compliance.

Procedure

How to raise a concern

In the first instance, you should raise your concerns directly with the Academy's Chief Operating Officer who will treat the matter in confidence. If for some reason this is not possible, or the concerns raised involve the Chief Operating Officer, you should contact a member of the Academy's HR team via hr@raeng.org.uk in confidence.

How the Academy will respond

The action taken by the Academy will depend on the nature of the concern. The matters raised may:

- Be investigated internally
- Be referred to the police
- Be referred to an external audit of some kind

Within ten working days of a concern being received, the officer with whom you have raised your concern will write to you to:

- Acknowledge the concern raised and indicate how the Academy proposes to deal with the matter
- Clarify whether any initial enquiries have been made
- Explain whether further investigations will take place and, if not, the reason(s) why
- Provide an estimate of how long the process will take

In the case of any investigation, you will be kept informed regularly of the progress. Once the investigation is completed, **a final written response** to your concern will be provided as soon as reasonably possible.

In addition to the protection afforded by the Academy, disclosures as outlined above are also protected by the Public Interest Disclosure Act 1998 and, in certain circumstances, the whistleblower may also make a protected disclosure to:

- A legal advisor
- A prescribed body, such as the Data Protection Registrar, the Environment Agency or the Health and Safety Executive

- An individual unconnected with the organisation

An employee who makes an external disclosure will be protected if they have previously raised the matter with the Academy, or they have not done so because they reasonably believe that they will be victimised or that the evidence will be concealed or destroyed.

The disclosure must be made in good faith, in the reasonable belief that the allegations are substantially true and must not be made for personal gain. Part of the assessment of reasonableness involves the Academy considering whether the individual has complied with the procedure as outlined earlier in this policy. Additionally, if all other procedures are to be bypassed, the employee must demonstrate that this was justified by the nature of the information.

Anonymous allegations

We recognise that individuals may choose to not disclose details of their name within their allegation. The Academy encourage anyone with serious concerns to share these details as anonymous allegations may limit ways to fully investigate the matter.

If we receive an anonymous allegation, this will be considered at the discretion of the Academy. In exercising this discretion, the following factors would be taken into account:

- The seriousness of the issued raised
- The credibility of the concern
- The likelihood of confirming the allegation from other, attributable, sources

Further information and independent advice

Employees can also obtain free confidential advice from Public Concern at Work, an independent whistleblowing charity. Public Concern at Work can be contacted either by telephone on 020 7404 6609, website www.pcaw.co.uk, or e-mail helpline@pcaw.co.uk

Document Control

This policy has been reviewed by: Mary Davies, Senior HR Manager
Review date: March 2022

Sharon Noble, Director of People and Trustee Board
members May – June 2022

Approved by: Sharon Noble, Director of People
Next review date: June 2023