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## Employee Public Interest Disclosure Policy

Date approved: 28 February 2020  
 Approved by: SMT  
 Responsible Manager(s): Director of Human Resources  
 Executive Lead: Executive Director, B&FC for Business

Applicable to staff:	Yes
Applicable to students:	No
Accessible to students:	No
Accessible to general public: (including clients)	Yes

### Consultation

Consultation undertaken with:		Date:
• AMT	Yes	14.01.20
• CCMT	Yes	14.01.20
• Students	N/A	
• Employee representatives ( <b><i>Employee related policies only</i></b> )	Yes	14.01.20
• Other	N/A	

Policy review frequency, normally: every 2 years

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## **1. Scope and purpose of this policy**

- 1.1 This policy applies to all Blackpool and The Fylde College (B&FC) employees. This policy does not form part of employee contracts nor does it confer any contractual rights.
- 1.2 The purpose of this policy is to clearly set out and explain B&FC's approach to disclosures made in the public interest, as set out in the Public Interest Disclosure Act 1998 and the Enterprise and Regulatory Reform Act 2013. It ensures that B&FC operates with the highest levels of openness and integrity at all times and deals effectively with any disclosures received.

## **2. Policy statement**

- 2.1 This policy aims to assist employees in understanding what is meant by a qualifying disclosure, and to set out B&FC's commitment to dealing with any disclosures received promptly, fairly and effectively.
- 2.2 A qualifying disclosure is one made in the public interest by an employee who has a reasonable belief that one or more of the qualifying disclosures below, has been or is likely to be committed:
  - 2.2.1 a criminal offence
  - 2.2.2 a breach of a legal obligation
  - 2.2.3 a miscarriage of justice
  - 2.2.4 a danger to the health and safety of any individual
  - 2.2.5 damage to the environment
  - 2.2.6 a deliberate attempt to conceal any of the above
- 2.3 B&FC is committed to promoting an ethical and open culture that values transparency and integrity, within which all employees are encouraged to act responsibly and where malpractice is not tolerated. This policy provides support and protection to employees who disclose concerns to B&FC provided the disclosure is made in the public interest and in the employee's reasonable belief relates to a concern within the scope of 2.2.
- 2.4 B&FC encourages employees to raise genuine concerns about suspected wrongdoing at the earliest practicable stage. Employees will not suffer any detriment as a result of making a legitimate disclosure and are offered support throughout the process. B&FC does not tolerate any form of harassment or victimisation of anyone raising a concern under this policy. However if maliciously unfounded disclosures are raised, B&FC will consider disciplinary or legal action.

2.5 B&FC will ensure that a disclosure is viewed with the seriousness it deserves and will be dealt with promptly and appropriately. It is difficult for any organisation to investigate anonymous disclosures, therefore B&FC may not investigate an anonymous disclosure.

### **3. Accountability**

3.1 The Director of Human Resources is responsible for the updating and implementation of this policy and associated procedure to ensure compliance with changes in employment law and equality and diversity legislation.

3.2 All employees are responsible for ensuring they follow the Employee Public Interest Disclosure Policy and associated processes for the purpose intended.

### **4. Student involvement**

4.1 There is no direct student involvement in the Employee Public Interest Disclosure Policy.

### **5. Linked policies**

5.1 Given the nature of a disclosure many policies may be invoked.

### **6. Linked procedures**

Employee Public Interest Disclosure Procedure

Given the nature of a disclosure many procedures may be invoked.

**No part of this Employee Public Interest Disclosure Policy is contractually binding.**

## 7. Equality Impact Assessment

<b>Impact Assessment for the 4 strands of Equality, Safeguarding, Health and Safety and Sustainability</b>	
<b>Initial Form to be completed with Risk Assessments or as part of a proposal or change to a policy, plan or new way of working</b>	
<p>Title of Activity: Employee Public Interest Disclosure Policy</p> <p>Author and Date: HR Manager February 2020</p>	<p><input type="checkbox"/> New or <input checked="" type="checkbox"/> Revision Please tick as appropriate</p> <p>Expected Implementation Date: February 2020</p> <p>What is the review date? Normally every 2 years</p>
<p><b>Equality and Diversity:</b> Which of the characteristics maybe impacted upon? And, if yes, how has this been considered? What are the risks? What are the benefits?</p>	<p>None expected</p> <p>Legal compliance</p>
<p><b>Safeguarding:</b> Are there any aspects of this proposal which could cause a learner/member of staff/visitor to feel unsafe? If yes, how has this been considered? What are the risks? What are the benefits?</p>	<p><input type="checkbox"/> Yes      <input checked="" type="checkbox"/> No</p>
<p><b>Health and Safety:</b> Have any risks been identified? If yes, how has this been considered? What are the risks? What are the benefits?</p>	<p><input type="checkbox"/> Yes      <input checked="" type="checkbox"/> No</p>
<p><b>Sustainability:</b> Are there expected benefits or impacts on sustainability issues? If yes, how have these been considered?</p>	<p><input type="checkbox"/> Yes      <input checked="" type="checkbox"/> No</p>
<p><b>Evidence:</b> What evidence do you have for your conclusions and expectations for these conclusions? How will this impact be monitored for all these considerations?</p>	<p>Policy complies with employment legislation. On-going monitoring once policy is used in practice.</p>
<p>Is this policy of a high/medium or low risk? :</p>	<p><input type="checkbox"/> High      <input type="checkbox"/> Medium      <input checked="" type="checkbox"/> Low</p>