

Title:	WaterBear Student Whistleblowing Policy
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Approved by:	Senior Management Team
Policy owner:	Chief Operating Officer

1. Purpose and Scope of this policy

- 1.1. All organisations face the risk of things going wrong or of unknowingly being involved in or subject to malpractice.
- 1.2. WaterBear (**we/our/us**) takes malpractice very seriously. We are committed to conducting our business with honesty, integrity, openness and accountability, and we expect our community, as a whole, to maintain these high standards, in accordance with our policies and procedures. This policy applies to all students (**you/your**) within our institution who we encourage to speak up about any behaviours that give you cause for concern. We want everyone to feel secure about raising such concerns.
- 1.3. The aims of this policy are:
 - to give students the opportunity and guidance to confidentially report concerns about suspected wrongdoing that affects WaterBear (and/or other people where there is a public interest) as soon as possible, in the knowledge that concerns will be taken seriously and investigated appropriately, and that their confidentiality will be respected
 - to provide students with guidance as to how to raise those concerns; and
 - to reassure students that they should be able to raise genuine concerns without fear of any repercussions including any detriment to their studies, results or qualifications obtained, even if they turn out to be mistaken.
- 1.4. It does not matter if a student who raises a concern is mistaken about it – you do not have to prove anything about the allegation that you are making but you must reasonably believe that the disclosure is made in the interests of the institution and its community and that the information you have tends to show some malpractice.
- 1.5. This policy is non-contractual, and we may amend it at any time.

2. When to use this policy

- 2.1. There is a difference between whistleblowing and raising a complaint. Whistleblowing is where you have a concern about a danger or illegality that has a public interest aspect to it, for example because it threatens other students, third parties or the public generally; whereas a complaint will typically relate to your personal educational circumstances or interactions with WaterBear.
- 2.2. This policy does not set out the procedure that applies to general or personal complaints about WaterBear. If you have a complaint about your own personal circumstances, such as any aspect of student life or an academic appeal, then you should use WaterBear's Student Complaints policy & Procedure, or academic appeals policies available [here](#), instead.
- 2.3. This policy may not be used to re-open or review a matter already decided in connection with WaterBear's other policies and procedures or to question or reconsider any financial or business decisions.
- 2.4. We have separate Anti-Bribery and Anti-Fraud policies, which are available [here](#). You should refer to those policies for reporting concerns about such issues instead of the process set out here.

3. Malpractice covered by this policy

- 3.1. Whistleblowing is the reporting of suspected malpractice, wrongdoing or dangers in relation to a company's activities. The kinds of malpractice covered by this policy include;
 - a. criminal offences (however, in relation to bribery and corruption and fraud, please refer to the reporting requirements set out in WaterBear's Anti-Bribery Policy or Anti-Fraud Policy, as applicable);
 - b. improper behaviours such as bullying or harassment;
 - c. breach of any legal, regulatory or professional obligation;
 - d. conduct likely to damage WaterBear's reputation or financial wellbeing;
 - e. danger to the health and safety of any individual;
 - f. damage to the environment;
 - g. academic malpractice or misconduct;
 - h. deliberately concealing any of the above, or deliberately concealing information demonstrating that one or more of the above are taking place; and
 - i. any retaliation against someone for speaking up about these matters.
- 3.2. Queries relating to whistleblowing, including whether something is within the scope of this policy, should be directed to the Chief Operating Officer (COO) Steve Cobain steve@waterbear.org.uk

4. Procedure for raising a concern

- 4.1. If you are concerned about any form of malpractice covered by this policy, you should normally raise the issue with your Head of Year. You may tell them in person or put the matter in writing if you prefer. We would hope that they would be able to find a way to resolve your concern quickly and effectively.
- 4.2. If you feel that you cannot tell your Head of Year for whatever reason, you should raise the issue with the Head of Education. The Head of Education may also feel that your concern should be referred to the Chief Operating Officer (COO), if so, they will discuss this with you before making the referral.
- 4.3. If you have raised concerns and you are still concerned, or the matter is so serious that you feel you cannot discuss it with either of the two individuals named above, you should raise the matter with Chief Operating Officer (COO) steve@waterbear.org.uk who will act as the Whistleblowing Officer.
- 4.4. Although you are not expected to prove the truth of your concern beyond doubt or provide evidence, you will generally need to provide the following information as a minimum:
 - a. the nature of the concern and why you believe it to be true; and
 - b. the background and history of the concern (giving relevant dates where possible)
- 4.5. You may wish to consider discussing your concern with another student or a member of staff before raising it formally under this policy but remember that once you have raised a concern formally (alone or with a colleague), in the interests of everyone involved, what follows will be a confidential process.

5. Responding to concerns raised

- 5.1. WaterBear is committed to ensuring that all disclosures raised will be dealt with appropriately, fairly and professionally. We aim to acknowledge your report within five working days of receipt.
- 5.2. WaterBear will conduct an initial assessment to decide what action we need to take to deal your report. This may involve simply clarifying certain matters, clearing up misunderstandings or resolving the matter without the need for investigation. We may need to arrange a meeting with you to discuss the concern raised. In such circumstances, you may bring another student, a member of staff or other appropriate representative to any meeting that takes place, provided that the companion shall respect the confidentiality of the disclosure and any subsequent investigation. WaterBear may ask you for further information about the concern raised, either at this meeting or at a later stage.
- 5.3. After its initial assessment, WaterBear will decide how to respond. Usually this will involve making internal enquiries first, but it may be necessary to carry out an

investigation at a later stage which may be formal or informal depending on the nature of the concern raised. External investigators may be brought in where necessary. WaterBear will endeavour to complete investigations within a reasonable time.

6. Investigations

- 6.1. Following receipt of a disclosure, the Company will need to investigate the disclosure. Depending on the nature of the disclosure, this may be investigated in line with the Company's Investigation Protocol.
- 6.2. WaterBear will keep you informed of the progress of the investigation carried out and when it is completed and give an indication of timings for any actions or next steps that WaterBear will take, but WaterBear will not be able to inform you of any matters which would infringe any duty of confidentiality owed to others. If it is determined that a concern should be dealt with under another internal procedure, we will notify you of that decision. That internal procedure will take place in the normal way and in accordance with any relevant policies.

7. If you are not satisfied

- 7.1. While we cannot guarantee a particular outcome you may be seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.
- 7.2. If you are not happy with the way in which your concern has been handled, you may contact the Chief Executive Officer (CEO) Adam Bushell adam@waterbear.org.uk

8. Confidentiality

- 8.1. WaterBear hopes that all students will feel able to voice concerns openly under this policy; however, should you wish to raise a concern, all such concerns shall be treated in confidence and every effort will be made not to reveal your identity to anyone, other than those involved in investigating the concern(s). If it becomes necessary for anyone else to know your identity in order to adequately investigate the concern, WaterBear will discuss this with you first. Furthermore, if disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of a disclosure without your help, so you may be asked to come forward as a witness. If you agree to this, you will be offered advice and support.
- 8.2. Whilst a concern may be made anonymously, WaterBear encourages you to put your name to the allegation whenever possible. If this is not done, it will be much more difficult for WaterBear to give feedback on the outcome of investigations. Concerns that are expressed completely anonymously are much less powerful and are difficult to investigate. WaterBear will consider them at its discretion, taking into account factors such as the seriousness of the issue raised, the credibility of the concern and the likelihood of confirming the allegation from other sources.



9. Raising your concern externally (exceptional cases)

- 9.1. The main purpose of this policy is to give all our students the opportunity and protection they need to raise concerns internally. WaterBear would expect that in almost all cases raising concerns internally would be the most appropriate course of action.
- 9.2. However, if for whatever reason, you feel that you cannot raise your concerns internally and you reasonably believe the information and any allegations are substantially true, it may be appropriate for you to raise the matter with an external body, such as a regulatory or professional body. In this case, we recommend that you direct your concern to the regulator of higher education, the Office for Students (OfS). The procedure for notifying the OfS is available on their website at: [Notifications - Office for Students](#).

10. Protection and support for those raising concerns

- 10.1. WaterBear is committed to good practice and high standards and to being supportive to students who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 10.2. Any student raising a genuine concern shall not suffer any detriment to their studies, results or qualifications obtained as a result of doing so. If an individual believes that they have suffered such treatment, they should inform Steve Cobain, Chief Operating Officer, steve@waterbear.org.uk immediately.
- 10.3. WaterBear will not tolerate any harassment or victimisation of any individual who has raised a concern under this policy. It should be noted that harassing or victimising individuals for raising concerns amounts to misconduct and could also lead to disciplinary action.
- 10.4. However, to ensure the protection of all our students, those who raise a concern maliciously and/or for personal gain and/or make an allegation they do not reasonably believe to be true may also be liable to disciplinary action under our Student Disciplinary policy.

11. Related Policies

- 11.1. This policy should be read in conjunction with the following policies:
 - Anti-Bribery Policy
 - Student Complaints Policy
 - Anti-Fraud policy