

RAISING CONCERNS

July 2019





The British Council seeks to uphold the highest ethical and legal standards across the organisation. To help us achieve this, we want you to feel that you can raise concerns you may have about malpractice or wrongdoing confidentially and without fear of victimisation or disadvantage. Our Raising Concerns Policy enables you to do this.

I've seen, heard or experienced something and I think I should report it, but who to and how?

If you are concerned about something you have seen, heard or experienced, we encourage you to raise it under this policy. You do not need to obtain evidence, just have a genuine belief that the malpractice or wrongdoing is taking place. Your concern will be treated seriously and investigated to ensure that instances of malpractice or wrongdoing are identified and dealt with appropriately.

What is covered?

Examples of malpractice or wrongdoing include, but are not limited to:

- abusing, exploiting or endangering a child
- endangering anyone's safety or security
- theft
- fraud or false accounting
- misuse of the British Council's property
- giving or receiving bribes
- failing to disclose outside business interests
- bullying or threatening behaviour
- breaches of law or regulation
- breaches of the Code of Conduct and other British Council policies.

It also includes covering up such malpractice or wrongdoing or enabling it to take place.

Other concerns and where to go

You may want to raise concerns about something that is a personal issue or complaint, such as discrimination, serious disagreements or recurring problems. These concerns are not covered by this policy. For these kinds of issues, please speak to your line manager, your HR Business Partner, your union or staff association representative or another senior manager for guidance.

You may also consider discussing any personal concerns you may have with the British Council's Employee Assistance Programme (EAP). This is a confidential service which allows you to talk with an impartial external adviser. Our EAP is fully accredited and abides by the British Association for Counselling and Psychotherapy (BACP) Ethical Framework which stipulates that under no circumstances, apart from with specific consent from the individual, would case details or identity be given to any third party, including the British Council. Being able to talk to someone impartial may help you to make a decision on whether to proceed. Depending on the nature of your concern, they may also be able to point you to additional advice, outside of the British Council.

WHAT DO I DO IF I HAVE A CONCERN?

You first need to raise your concern with an appropriate manager. The list below shows you who to approach.

Level one

One of the following:

- your line manager
- your line manager's manager
- your Head of HR.

Level two

If, for any reason, you do not feel comfortable speaking to any of the level one contacts, please direct your concern to the most appropriate level two contact. Talking to our EAP at this point may also be helpful before deciding how to proceed.

- Head of Counter Fraud Management (for concerns about fraud, bribery, money laundering, counter terrorism) dave.carter@britishcouncil.org
- Head of Safeguarding (for concerns about neglect or physical, emotional or sexual abuse of children). Check the Safeguarding intranet site for more information elaine.ryan@britishcouncil.org
- Head of Crisis, Safety and Security (for concerns about the safety or security of people or premises) mathew.perrin@britishcouncil.org
- Interim Data Protection Officer and Head of Information Governance and Privacy (for concerns about information security and privacy) jolyon.stone@britishcouncil.org
- Head of Global Employee Relations (for concerns about relationships at work, issues relating to employment policies and procedures, or concerns not obviously covered above) nita.bewley@britishcouncil.org

Level three

If your concerns are of such a nature to prevent you from approaching a level one or level two contact, then you should report them directly to either:

- The Chief Operating Officer andy.williams@britishcouncil.org
- or
- Secretary to the British Council and Head of Corporate Affairs alison.coutts@britishcouncil.org

Finally, if you really feel that you cannot raise the concern internally, there are certain external people or organisations that you can report your concern to.

They include regulators, such as the Charity Commission, and the Comptroller and Auditor General, who is the British Council's external auditor. There is a full list at: <http://bit.ly/prescribedlist>

However, you must make sure that you have chosen the correct person or organisation to report your concern to. Before reporting a concern externally, you should take specialist advice. This could be from:

- your trade union or staff association
- Protect – an independent UK charity which advises people on how to raise concerns while providing an impartial and objective view on the concern
- Employee Assistance Programme
- Charity Commission
- Health and Safety Executive.

How we investigate

Although you will receive some feedback on the information you have supplied, it may not be possible to share the detail of any subsequent investigation with you as the British Council may be bound by duties of confidentiality. The British Council will consider the concerns raised as a matter of urgency. Any subsequent investigation will be conducted as sensitively and speedily as possible and in a consistent and fair way.

Confidentiality and anonymity

This policy allows colleagues to raise concerns in confidence. So far as possible, your anonymity will be preserved in the course of any subsequent investigation.

Depending on the nature of the concern, there may be matters that cannot just be dealt with internally and external authorities may need to be involved. Should that become necessary, the British Council may need to make a referral without your consent. Wherever possible, you will be informed if such a referral is made.

You can report a concern anonymously. However, we would prefer that you identify yourself, as this will offer a better opportunity to investigate your concerns properly. You can be assured that, provided your concerns are raised in good faith, you will be protected against any detriment on account of raising them. However, should you still feel unable to raise a concern in person, anonymity is better than silence.

How you are protected

The British Council will not penalise anyone for raising a genuine concern in good faith, even if it turns out to be unfounded. Any member of staff who harasses or victimises someone for raising a concern in good faith will themselves be subject to disciplinary action.

False or malicious concerns

The Raising Concerns Policy is designed to deal with genuine staff concerns that are made in good faith. Submission of a concern that is found to be fictitious or made in bad faith (for example, out of spite or for personal gain) will be subject to disciplinary action.

What happens next?

Your concerns will be taken seriously. The person you have disclosed your concern to will review the information you have provided to make a decision on whether to investigate further. They may ask to speak

to you to obtain further information as this will enable them to investigate your concerns more thoroughly. Please let them know if you would like to be accompanied at that interview. This could be by a friend or family member, or a staff association or union representative.

Need further advice?

Protect
www.pcaaw.co.uk

Employee Assistance Programme
http://intranet.britishcouncil.org/hr/05Employee_relations/Pages/EAP.aspx

Charity Commission
<https://www.gov.uk/government/publications/complaints-about-charities>

Health and Safety Executive
www.hse.gov.uk/contact/concerns.htm

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