

1. Introduction

The British Council is committed to conducting its activities in accordance with the highest ethical and legal standards and does not tolerate malpractice or wrongdoing across the organisation.

This policy applies to all British Council employees, agency staff, contractors and external consultants. It provides a procedure for raising concerns about malpractice or wrongdoing at work. Where a concern is raised outside of the UK, legal advice should be sought on any local legal requirements. It is also intended to reassure staff that they can raise such concerns without fear of victimisation, subsequent discrimination or disadvantage.

The Speaking-Up policy supports the [Code of Conduct](#), which applies to all members of staff worldwide.

2. Scope

The Speaking-Up Policy will enable the British Council to take appropriate action to:

- Support good governance,
- Prevent or report criminal activity,
- Pre-empt unlawful acts or other wrongdoings,
- Create an environment in which people are able to speak up and raise concerns, reducing the need to make anonymous complaints,
- Address information management, privacy, confidentiality, health and safety or environmental issues to prevent injury or damage occurring.

3. Purpose

The purpose of the Speaking-Up policy is to enable and encourage staff to raise concerns about serious malpractice or wrongdoing, such as:

- Theft or other criminal acts,
- Misuse of the British Council's assets,
- Integrity of financial reporting,
- Material breaches of British Council policies, such as the Code of Conduct, Child Protection, Privacy and Information, Health and Safety or Environment,

- Misconduct such as receiving bribes or failing to disclose outside business interests, and
- Breaches of regulatory requirements.

The policy provides a safe alternative to silence and enables concerns to be dealt with effectively and efficiently, whilst deterring and discouraging people from abusing their position or authority. It can act as an early warning system to alert the organisation before it is too late, providing information so that issues can be addressed before too much damage is done.

The policy also enables individuals to raise concerns confidentially. Although most concerns will be dealt with locally within the office or department, there may be occasions when staff may need to take their concerns to designated people outside the line of management structure. However, individuals are encouraged to raise concerns internally through the procedure set out in the policy rather than ignoring a problem or “blowing the whistle” to external sources.

Any concerns raised in good faith will be treated seriously and will be investigated as set out in this policy and in compliance with all applicable legislation, such as the UK Public Interest Disclosure Act 1998, the Human Rights Act 1998, the UN Declaration of Human Rights and any other comparable legislation overseas.

When a concern is raised, the British Council will be able to instigate an appropriate investigation. Following the investigation, the British Council will be able to take appropriate action against the wrongdoers, to minimise any adverse impact and to take action to eliminate or significantly reduce the scope for reoccurrences.

The policy is not intended to address concerns relating to the British Council as your employer, for example workplace disputes and contractual/salary rights. These concerns should be raised under the specific policies relating to [Grievances and Appeals](#) and [Harassment and Bullying](#). Any concerns relating to fraud, bribery or corruption should be raised under the [Anti-Fraud and Corruption Policy](#).

The British Council will not tolerate harassment or victimisation of any member of staff for raising a genuine concern in good faith under this policy. Disciplinary action will be taken against the perpetrator in the event of such harassment or victimisation taking place. Equally, disciplinary action may be taken against a member of staff raising a concern maliciously or falsely.

4. Confidentiality and anonymity

The British Council recognises that in some cases staff may choose to raise a concern in confidence, therefore this policy includes the option of having confidential meetings. However, there may be matters that cannot be dealt with internally and external authorities will need to become involved. Should that become necessary, the British Council reserves the right to make such a referral without the member of staff's consent. The British Council will inform the member of staff if such a referral is made.

Members of staff may also choose to raise concerns anonymously. This will be taken in good faith. However, staff must be aware that this may lead to difficulties in conducting an effective investigation into the concern and will mean that you will not be advised of the outcome of any investigation.

5. External support

If you would like further guidance before taking the next steps or wish to discuss your concerns in confidence, you may contact Public Concern at Work. Public Concern at Work is an independent UK charity, which advises people on how to raise concerns whilst providing an impartial and objective view on the concern. Their contact details are set out below.

We recognise that raising concerns at work can be stressful and the Employees Assistance Programme, a telephone helpline, is available for staff to get support (See [HR Intranet](#) for further details).

6. Raising a concern

If you believe you have evidence of serious malpractice or wrongdoing, you should follow the procedure outlined below and the process in Annexe 1.

There is no set timescale for raising or addressing a concern, but to ensure they are addressed swiftly it is preferably for you to do this as soon as possible.

You must not do any of the following:

- Contact the suspected perpetrator in an effort to determine the facts,
- Discuss the case facts, concerns or allegations with anyone outside the British Council unless specifically asked to do so by the Speaking-Up contact officer,
- Discuss the case with anyone in the British Council other than those listed below,

- Attempt personally to conduct investigations, interviews or question anyone unless asked to do so by the Speaking-Up contact officer.

As soon as possible if you suspect any malpractice or wrongdoing, first raise your concern with your line manager, either orally or in writing by letter or email. The line manager will, if possible, provide a valid explanation. If the line manager is unaware of a valid explanation they will look into the matter initially to assess what action should be taken. The line manager will inform you of the intended course of action.

First Stage

If you feel unable to raise the matter with your line manager or they have not provided a valid explanation, then you must contact one of the First Stage Contacts directly (see a list contacts below). You should provide your contact details, any background or history relating to the concern and the reasons why you are concerned. The First Stage Contact will arrange an initial confidential meeting with you as soon as possible.

When a concern has been raised the First Stage Contact will provide you with the following:

- Acknowledgement that the report of concern has been received,
- Indicate how the British Council proposes to deal with the matter,
- Give an estimate of how long it will take to provide a final response,
- Advise if any initial enquiries have been made, and
- Advise whether further investigations will take place and if not, why not.

If the First Stage Contact decides an investigation (internal or external) is appropriate, they will communicate with you, subject to legal constraints, the conclusion of the investigation and any actions to be taken.

The First Stage Contact will also :

- Obtain consent to release your identity to specified staff on a need-to-know basis,
- Check that the action that led to the allegation has ceased,
- Check that there is no victimisation resulting from the allegation, and

- Ensure that there is no further similar action or victimisation elsewhere in the department or country as a result of the outcome of the investigation.

If the concern is not resolved through this process then you may go to the Final Stage (see below).

Final Stage

If the matter is in the public interest and having followed the First Stage process you continue to have concerns, then you may contact the Final Stage Contact (see list below), who is a Member of the Board of Trustees. You must outline your concerns in writing to the Final Stage Contact as soon as possible.

The Final Stage Contact shall, as appropriate, commission further investigation of the concerns reported or make a decision based on the evidence presented in the First Stage.

The Final Stage Contact shall communicate the outcome of the decision and/or further investigation to you, outlining the conclusion and the action to be taken, as soon as possible.

This is the final step in the internal procedure for investigating concerns of malpractice or wrongdoing.

7. Corporate case management panel

The corporate case management panel will be convened when a member of staff alleges malpractice or wrongdoing. Due to the potential seriousness of a concern of this nature, the panel's role is more active than that of a case assessment panel. Rather than acting in an advisory capacity, the corporate case management panel directs the case and the accompanying investigation, and decides the outcome.

Composition

As cases involving malpractice or wrongdoing can be extremely serious, the corporate case management panel normally consists of senior managers within the British Council.

Panel members could be:

- Head Internal Audit
- Director Global Human Resources

- Head Employment & Rewards
- Head Legal

8. Investigation

- The investigation of malpractice issues must involve an independent internal or external investigator.
- If the British Council is obliged to report the matter externally, the Speaking-Up contact officer or the corporate case management panel must ensure that independent and objective evidence is provided to the relevant authorities.
- The First Stage Contact must keep the member of staff informed of the nature of the external investigation, and inform them if the British Council intends to disclose their identity to an external authority.
- If the investigation or concern raised involves external third parties, Head of Legal must provide guidance, including a review of reports and management letters.
- The Head Legal must also consider the rights of reply of any internal or external third parties in the event of potential action against them.

9. Contacts

First Stage Contacts

- Head Internal Audit
The British Council
10 Spring Gardens
London SW1A 2BN
Phone: +44 (0)20 7389 4535
- Director Global Human Resources
The British Council
10 Spring Gardens
London SW1A 2BN
Phone: +44 (0)20 7389 4243
Fax: +44 (0)20 7389 4164

Final Stage Contact

- Vernon Ellis – Chair of the British Council
The British Council
10 Spring Gardens
London SW1A 2BN
Phone: +44 (0)20 7389 4675
Fax: +44 (0)20 7389 4984

External Contact

- Public Concern at Work
Suite 301, 16 Baldwins Gardens
London EC1N 7RJ
Phone: 020 7404 6609
Email: services@pcaw.co.uk
www.pcaw.co.uk

Related information:

[Code of Conduct](#)

[Anti -Fraud and Corruption Policy](#)

[Fraud Response Plan](#)

[UK Bribery Act](#)

[Grievances and Appeals](#)

[Harassment and Bullying](#)

[Child Protection Policy](#)

Annexe 1- Raising a concern or suspicion

