

Whistleblowing Policy



Document control

Document Title	Whistleblowing Policy
Document Category	General Policies
Version	1.0
Status	Approved
Author	Operations
Date of current version	May 2022
Date of next review	July 2025
Document location	ICMT website
Communication plan	Email link to website included in offer and on the student portal.
Related documentation	N/A

Contents

Document control	1
1. Introduction	3
2. Scope	4
3. Definitions.....	4
4. Procedure.....	5



1. Introduction

- 1.1 The International College of Musical Theatre (the ICMT) is committed to conducting its affairs responsibly and transparently, meeting the expectations of the Nolan Principles on standards in public life. This Policy provides a process through which employees, students and members of the Senior Management Team can disclose information which they believe may show one or more of the following:
- a) A criminal offence has been committed, is being committed or is likely to be committed. Where fraud or money laundering activity is suspected, reference should be made to the ICMT's Anti-Bribery and Corruption Policy. Individuals may choose to disclose their concerns through these procedures or under the Whistleblowing Policy.
 - b) A person has failed, is failing or is likely to fail to comply with any legal obligation to which they are subject.
 - c) That a miscarriage of justice has occurred or is likely to occur.
 - d) The health or safety of any individual has been or is likely to be endangered.
 - e) The environment has been, is, or is likely to be damaged.
 - f) That information shows that any matter falling within statements 1.1a to 1.1e is likely concealed.
- 1.2 Staff, students and members of the Senior Management Team may be the first to realise that there is something wrong within the ICMT. THEREFORE, the ICMT actively encourages individuals to come forward and speak up if they see or suspect serious wrongdoing.
- 1.3 To promote a culture of shared responsibility and openness, this Whistleblowing Policy has been written to include the ICMT's wider community. The terms of the Public Interest Disclosure Act specifically address those employed in the UK.
- 1.4 This Policy offers protection to individuals reporting such matters in the public interest. The ICMT will take all reasonable steps to protect such individuals from harassment or discrimination relating to disclosure.

2. Scope

- 2.1 Employees, students and members of the Senior Management Team can disclose the procedures of this Policy where they reasonably believe that the information is substantially accurate.
- 2.2 Any concern or complaint by an employee about their terms and conditions of employment should be raised through the Grievance Procedure.
- 2.3 Students with concerns regarding any aspect of the ICMT's provision should be raised through the Student Complaints Procedure.
- 2.4 It should be emphasised that this Policy is intended to assist individuals who reasonably believe that they have discovered malpractice or serious wrongdoing, provided that they make the disclosure in the public interest in accordance with this Policy and associated procedure. It is not designed to be used to question financial or business decisions taken by the ICMT.
- 2.5 Nothing in this procedure prevents individuals from exercising their statutory rights under the Public Interest Disclosure Act 1998. However, individuals are advised to seek professional or trade union advice before deciding to disclose matters to a third party/prescribed person outside the ICMT without attempting to use this procedure in the first instance.
- 2.6 Individuals should be aware that reporting concerns to the media will, in most cases, result in the loss of legal whistleblowing rights.

3. Definitions

3.1 Whistleblowing

Whistleblowing is the disclosure of concerns in the public interest. It relates to malpractice, impropriety or wrongdoing within the ICMT or its activities. Such concerns which would be in the public interest might include:

- a) Commission of a criminal offence.
- b) Failure to observe a legal obligation or comply with the regulatory requirements of the ICMT.

- c) Miscarriage of justice.
- d) Danger to health and safety.
- e) Damage to the environment.
- f) Bribery.
- g) Fraud.
- h) Financial or non-financial maladministration and malpractice.
- i) Serious failure to comply with the regulations of the ICMT.
- j) Academic or professional malpractice.
- k) Unauthorised disclosure of confidential or personal information.
- l) Failure of (an) individual(s) to disclose a significant conflict of interest.
- m) Suppression or concealment of any information relating to any of the above.

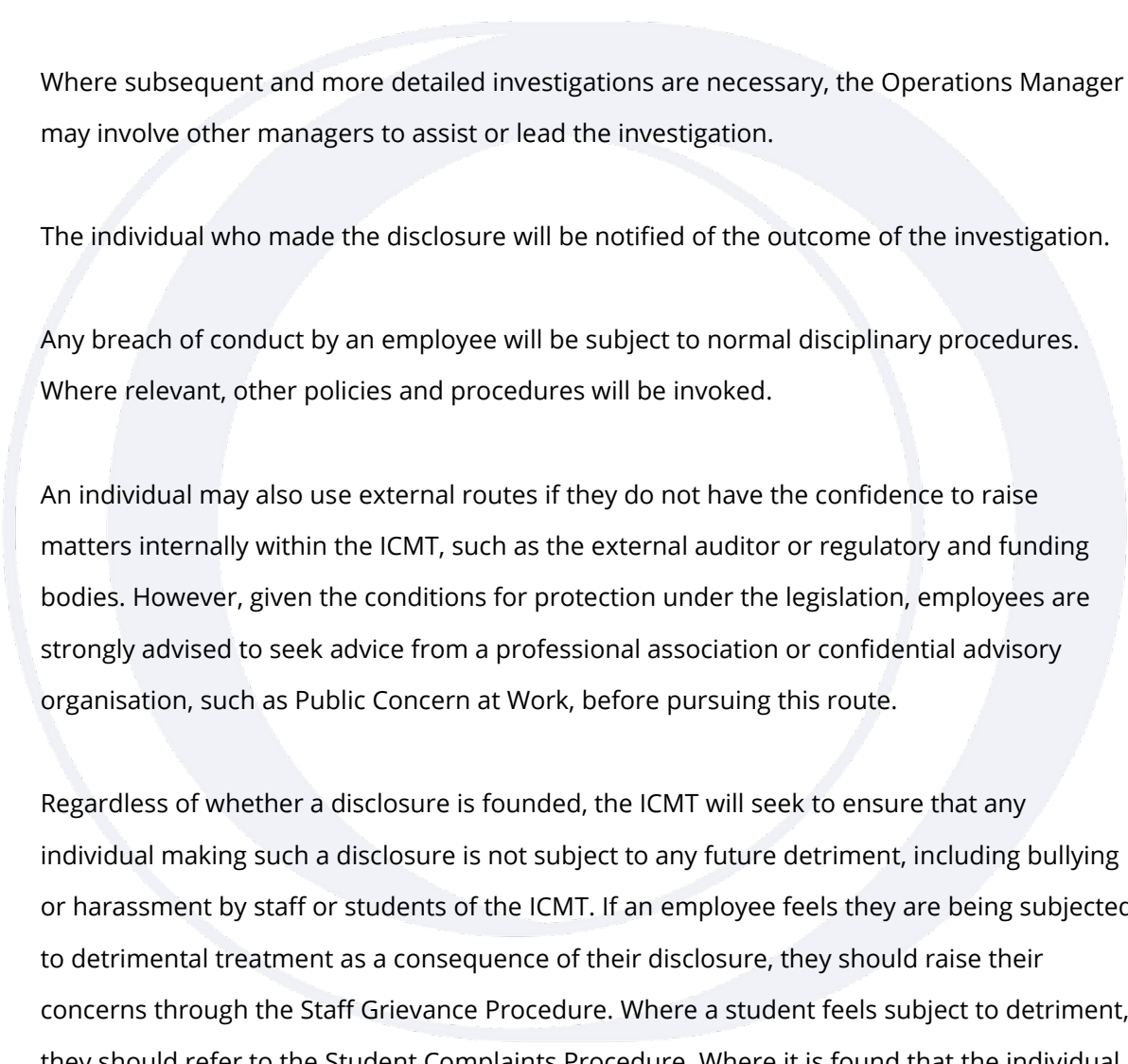
The above list is not intended to be exhaustive. This Policy is designed to allow concerns of the above nature to be disclosed. Concerns that are not of public interest will not be considered under this Policy but may be considered under an alternative policy or procedure.

3.2 Whistle-blower

A whistle-blower is a person who discloses a concern in good faith in relation to any of the above concerns or concerns of public interest relating to the ICMT's activities.

4. Procedure

- 4.1 Disclosures should be made directly to the Operations Manager. Where the disclosure relates to the actions of the Operations Manager, then the Principal should be informed.
- 4.2 If the Operations Manager considers the disclosure to be sufficiently serious, the matter will be brought to the attention of the Senior Management Team.
- 4.3 Individuals making a disclosure are encouraged to put their name to it. Whilst the ICMT will make every effort to protect the individual's identity, it must be recognised that the investigation process may reveal them as the source. Where formal disciplinary action or criminal or civil proceedings result from an investigation, it may not be possible to keep the individual's identity confidential.

- 
- 4.4 The Operations Manager will investigate the disclosure to ascertain if there are sufficient grounds for proceeding further. Where disclosure relates to the Principal, the investigation will be conducted alongside other senior management team members. Where it is decided not to proceed, the decision will be explained fully to the individual who made the disclosure.
 - 4.5 Where the disclosure was made by a member of the Senior Management Team, the matter will be addressed by the Principal.
 - 4.6 Where subsequent and more detailed investigations are necessary, the Operations Manager may involve other managers to assist or lead the investigation.
 - 4.7 The individual who made the disclosure will be notified of the outcome of the investigation.
 - 4.8 Any breach of conduct by an employee will be subject to normal disciplinary procedures. Where relevant, other policies and procedures will be invoked.
 - 4.9 An individual may also use external routes if they do not have the confidence to raise matters internally within the ICMT, such as the external auditor or regulatory and funding bodies. However, given the conditions for protection under the legislation, employees are strongly advised to seek advice from a professional association or confidential advisory organisation, such as Public Concern at Work, before pursuing this route.
 - 4.10 Regardless of whether a disclosure is founded, the ICMT will seek to ensure that any individual making such a disclosure is not subject to any future detriment, including bullying or harassment by staff or students of the ICMT. If an employee feels they are being subjected to detrimental treatment as a consequence of their disclosure, they should raise their concerns through the Staff Grievance Procedure. Where a student feels subject to detriment, they should refer to the Student Complaints Procedure. Where it is found that the individual has suffered a detriment, steps will be taken to redress this, and disciplinary action may be taken against those responsible.
 - 4.11 If an investigation concludes that a disclosure has been made maliciously, the whistle-blower will be subject to disciplinary action through relevant procedures.