



Medipro

WHISTLEBLOWING POLICY

1. Rationale

Medipro are committed to the principle of public accountability. We will investigate genuine and reasonable concerns expressed by students, relating to malpractice within the organisation and will ensure that students are not discriminated against or suffer a detriment because of making such a disclosure.

Legal Overview

Public Interest and Disclosure Act 1998 – this is the key whistleblowing legislation and provides protection to students who raise (in good faith) concerns about specific matters, called “qualifying disclosures”. These disclosures may include suspicions of:

- a criminal offence;
- a miscarriage of justice;
- an act creating risk to health and safety;
- an act causing damage to the environment;
- a breach or failure to comply with any legal or professional obligation or regulatory requirement
- bribery
- Poor treatment or risk to patient care
- financial fraud or mismanagement
- unauthorised disclosure of confidential information
- a concealment of any of the above is being or is likely to be committed.

To be protected under the Public Interest and Disclosure Act students must have a reasonable belief that their disclosures are made in the public interest. Students raising concerns related to a personal matter should therefore be referred to the Grievance/Complaints policy and procedure.

Bribery Act 2012 - makes it a criminal offence to give a promise, offer a bribe, request or receive a bribe. Organisations must also have adequate prevention procedures in place or risk committing a corporate offense.

Version number	001	Used by	All
Version date	23 April 2020	Business Area	ST
Version expiry	23 April 2022	Document ID number	ST 004
Version status	Live document	Document classification	Internal Use



Medipro

2. Process

Students should normally address any concerns to an appropriate Module Leader. If this would be inappropriate (possibly due to the implication of the Module Leader) then concerns should be addressed to the either the Programme Leader. In instances where students feel that the matter should be reported externally they can also contact the HCPC.

Student Protection

Students should generally be encouraged to put their names to any disclosures they make. However, the identity of the individual who has raised a concern will be protected and will not be disclosed, so far as possible, if they request it.

Request for anonymity will be subject to:

- The seriousness of the issue raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources.

Students should be made aware that they may be asked to present evidence and reveal their identity if the need arises.

The Investigation Process

Investigations will differ depending on the nature of the issue being raised. Some may involve internal investigators and/or the police. As such it is not possible to set an exact time scale for investigations, although it should be conducted as speedily as possible.

Version number	001	Used by	All
Version date	23 April 2020	Business Area	ST
Version expiry	23 April 2022	Document ID number	ST 004
Version status	Live document	Document classification	Internal Use



Medipro

If there is any evidence of criminal activity, then the investigating officer should inform the police. Medipro will ensure that any internal investigation does not hinder a formal police investigation. All responses to the complainant will be in writing and sent to their home address. The investigating officer should follow these steps:

- Full details and clarifications of the complaint should be obtained.
- The investigating officer should inform the student against whom the complaint is made as soon as is practically possible. The student will be informed of their right to be accompanied by a representative at any future interview or hearing held under the provision of these procedures.
- The investigating officer should consider the involvement of the Medipro Board of Directors.
- The allegations should be fully investigated by the investigating officer with the assistance where appropriate, of other individuals/bodies.
- A judgement concerning the complaint and validity of the complaint will be made by the investigating officer. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement. The report will be passed to the Board of Directors as appropriate.
- The Board of Directors will decide what action to take. If the complaint is shown to be justified, then they will invoke appropriate action.
- The complainant should be kept informed of the progress of the investigations and, if appropriate, of the outcome.
- If appropriate, a copy of the outcomes will be passed to the HCPC to enable a review of the procedures.

If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcome of the investigation, Medipro recognises the lawful rights of students and ex-students to make disclosures to prescribed organisations (such as the Health and Safety Executive, the Audit Commission, or other regulators), or, where justified, elsewhere.

Guidance for Tutors

When an issue is raised, it is important for tutors to try view the allegations objectively and note down any details of the complaint. Issues should be addressed as soon as possible.

Version number	001	Used by	All
Version date	23 April 2020	Business Area	ST
Version expiry	23 April 2022	Document ID number	ST 004
Version status	Live document	Document classification	Internal Use



Medipro

Tutors should not try and investigate the matter themselves or disclose the information with anyone other than those with the proper authority.

Tutors should immediately inform one of the relevant parties:

- Quality Team
 - Programme Leader
 - Module Leader
 - Programme Coordinator
- Practice Placement Facilitator

Untrue Allegations

If an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

Version number	001	Used by	All
Version date	23 April 2020	Business Area	ST
Version expiry	23 April 2022	Document ID number	ST 004
Version status	Live document	Document classification	Internal Use