POLICIES & PROCEDURES

Raising Concerns Policy

Policy Owner:	Director of Corporate Services
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1. Introduction

1.1 Raising a concern means notifying South West College about suspected danger, malpractice, risk, abuse, wrongdoing or illegality that affects others or the public interest, including learners, staff, stakeholders, members of the public, the College or the proper use of public funds. A concern may be raised by anyone within or outside the College.

1.2 South West College is committed to the highest possible standards of openness, integrity and accountability in the delivery of its education, training and support services. As a Partner Organisation of the Department for the Economy, this policy has been developed in alignment with the Department for the Economy Raising Concerns Policy and the Northern Ireland Civil Service Raising a Concern Policy Framework. The College encourages staff and others to raise genuine concerns and will not tolerate victimisation, harassment, bullying, retaliation or any other detriment arising from a concern being raised. Its purpose is to:

i.) reassure staff, learners and others that they can raise genuine concerns about potential wrongdoing through clear and accessible reporting arrangements, in confidence where requested, without fear of detriment;

ii.) provide arrangements through which members of the public and other external stakeholders can raise concerns about the proper conduct of public business by the College; and

iii.) support an open culture in which concerns are listened to, taken seriously and handled fairly, appropriately and proportionately. To support this culture, the Director of Corporate Services, Head of People and Culture and Head of Quality and Student Engagement have been appointed as the College's Speak Up Champions. They provide advice, guidance and support to individuals raising concerns and promote learning and openness across the College. They do not investigate concerns or determine outcomes.

2. Policy Scope

2.1 This policy applies to all employees of South West College, including temporary and agency workers, contractors, consultants, Governing Body members and others

carrying out work on behalf of the College. It also provides a route through which learners, former employees, members of the public, suppliers, partner organisations and other external stakeholders may raise concerns about suspected danger, malpractice, risk, abuse, wrongdoing or illegality relating to the College or the proper use of public funds.

3. Types of Concern

3.1 This policy relates to concerns about suspected malpractice, risk, abuse or wrongdoing within the College. Types of concerns could include, but are not restricted to:

- the abuse of children and /or vulnerable adults (physical or psychological);
- health and safety risks, either to the public or other employees;
- any unlawful act (e.g. theft);
- the unauthorised use of public funds (e.g. expenditure for improper purpose);
- a breach of the Employee Code of Conduct;
- maladministration (e.g. not adhering to procedures, negligence);
- failing to safeguard personal and/or sensitive information (data protection);
- damage to the environment (e.g. pollution);
- fraud and corruption (e.g. to give or receive any gift/reward as a bribe);
- abuse of power;
- poor value for money;
- other unethical conduct; and
- any deliberate concealment of information tending to show any of the above.

3.2 Personal grievances or dissatisfaction in respect of employment issues are not considered as a raising concern, unless a member of staff's particular case is in the public interest. Issues which affect staff personally, such as a breach of their individual employment rights or bullying, will be dealt with under the appropriate College Policy e.g. Dignity at Work or the Grievance Procedure.

3.3 Raising a concern is very different from a complaint. When someone complains, they are saying that they have personally been poorly treated, for example, through receiving an unsatisfactory level of service from the College, and the complainant is

seeking redress or justice for themselves. The relevant guidance is in the Customer Complaints and Compliments Policy.

4. Confidentiality and Anonymity

4.1 You may wish to raise your concern openly, but you can choose to raise it confidentially. This means that, while you are willing for your identity to be known to the person you report your concern to, you do not want your identity disclosed to anyone else. We will maintain your confidentiality insofar as possible, but there may be circumstances where we are required to disclose it (e.g. by a court or tribunal). If such a situation arises, this will be discussed with you. If you wish to raise concerns confidentially, either from the outset or at any stage during the process, we will do all we can to ensure that is possible.

4.2 You can choose to raise your concern anonymously. While concerns raised anonymously will be dealt with in the same manner as all others, detailed investigations may be more difficult, or even impossible, if you cannot be contacted for further information. There is also a chance that any documents or information you provide might, unknown to us, reveal your identity, making it more difficult to protect your position.

4.3 All information is treated confidentially and held securely in line with the requirements of the General Data Protection Regulations. Access to information and documentation relating to your concern will be restricted in order to protect the identity of all those involved, including those against whom allegations are made.

5. Advice and Guidance

5.1 The College's Speak Up Champions provide confidential advice, guidance and support to staff, learners and external stakeholders who are considering raising a concern. They can help an individual understand whether an issue falls within this policy, explain the available routes and signpost other sources of support. They do not investigate concerns or determine outcomes.

5.2 The Speak Up Champions may be contacted through their individual College email addresses or through the dedicated confidential mailbox at raisingconcerns@swc.ac.uk. Emails should use "Raising a concern" in the subject line.

5.3 The College's Speak Up Champions should normally be the first point of contact for advice about raising a concern within the College. Advice may instead be sought from the Department for the Economy's Fraud and Raising Concerns Branch where an individual is unsure about the appropriate route, believes the concern may involve senior College management or the College's governance arrangements, or does not feel able to seek advice through the College. Seeking advice from DfE does not prevent a concern from being raised through the College's internal arrangements. Information about formally raising a concern outside the College is provided in Section 8.

5.4 The DfE Fraud and Raising Concerns Branch provides advice, information and guidance to staff of Partner Organisations and to people outside the Department.

5.5 The DfE Fraud and Raising Concerns Branch can be contacted using the following details:

Address: Floor 2, Adelaide House
39-49 Adelaide Street
Belfast, BT2 8FD
Confidential email: raising.concerns@economy-ni.gov.uk
Speak-Up Champion phone number: 028 9052 9216
24-hour phoneline with messaging facility: 028 9025 7422

5.6 Independent advice is available from Protect, an independent charity providing impartial expert advice on raising concerns. Protect can be contacted on 020 3117 2520, by email at info@protect-advice.org.uk, or through its online advice form.

5.7 The Northern Ireland Audit Office's Raising Concerns: A Good Practice Guide for the Northern Ireland Public Sector provides further guidance, including information for members of the public on raising concerns and how public bodies should handle

them.

6. How to Raise a Concern: College Staff

6.1 A concern should be raised as soon as possible, either orally or in writing. The person raising it should provide the relevant facts, dates, people involved and any support information available. They do not need to prove their concern but should explain the basis for it and why they believe the information is relevant.

6.2 Employees should normally raise a concern with their line manager. Where this is not appropriate, or the individual does not feel able to use the normal management route, the concern may be raised with another appropriate manager or a College Speak Up Champion. A concern may also be submitted directly to the dedicated confidential mailbox at raisingconcerns@swc.ac.uk, using “Raising a concern” in the subject line.

6.3 A manager who receives a concern must take it seriously and promptly refer it to the Director of Corporate Services, unless the concern relates to that postholder or another reporting route in this section applies. Managers must not investigate the matter themselves or attempt to gather evidence beyond recording the information provided.

6.4 Where a concern relates to a member of the Senior Leadership Team, it should be raised with the Secretary to the Governing Body, who will refer it through the appropriate Governing Body route. Where a concern relates to the Principal and Chief Executive or the Secretary to the Governing Body, it should be raised with the Chair of the Governing Body.

6.5 Learners and external stakeholders may raise a concern through the dedicated confidential mailbox at raisingconcerns@swc.ac.uk or in writing to the Director of Corporate Services. They may seek advice from a Speak Up Champion before deciding which route to use.

6.6 If the concern cannot appropriately be raised through the College routes above, or

the individual believes the matter is exceptionally serious, the external reporting options in Section 8 may be used.

7. How to Raise a Concern: Non-Staff Members

7.1 Anyone external to the College can raise a concern with the College Speak-Up Champions using the contact details provided.

7.2 Concerns raised will be treated in the strictest confidence.

8. Raising a Concern Externally

8.1 The College encourages anyone wishing to raise a concern to raise it internally in the first instance. However, in cases where someone is uncomfortable about doing so, or the issue is very serious, the issue can be raised with:

DfE Fraud and Raising Concerns Branch
Address: Level 7 Adelaide House
39-41 Adelaide Street
Belfast BT2 8FD
Email: raising.concerns@economy-ni.gov.uk

Or with the Northern Ireland Audit Office (NIAO).
Address: The Comptroller & Auditor General Northern Ireland Audit Office
106 University Street
Belfast BT7 1RU
Tel: +44 (028) 9025 1062 or (028) 9025 1000
Email: raisingconcerns@niauditoffice.gov.uk.

Or in relation to a Health and Safety concern, the Health and Safety Executive for Northern Ireland.
Address: Health and Safety Executive for Northern Ireland
83 Ladas Drive

Belfast BT6 9FR

Email: mail@hseni.gov.uk

Phone: 0800 0320 121

9. Handling Concerns Raised

9.1 Once a concern has been raised, the College will assess what action needs to be taken and ensure that it is handled appropriately.

9.2 Following an initial assessment by the Speak Up Champion(s), if the concern falls more properly within the Staff Grievance Policy, another HR policy or the Complaints Procedure, or would be better considered or investigated by another body, such as DfE or another department, the person who raised the concern will be advised.

9.3 Where the concern relates to possible fraud, the College will deal with it in accordance with the Fraud Policy and Response Plan.

9.4 All concerns raised will be taken seriously and, where investigation is required, will be investigated appropriately. All enquiries will be undertaken in a proportionate and appropriate manner.

10. Communication with the Person who Raised a Concern

10.1 The College should be provided with as much relevant information as possible to enable it to assess the concern and determine what enquiries or other action may be required. This should include the circumstances giving rise to the concern, relevant dates, people involved, locations and any available supporting information or documentation.

10.2 Where a concern is raised anonymously, the College will not be able to contact the person for clarification or further information. This may restrict the College's ability to fully assess or investigate the concern and may prevent feedback being provided.

Where contact details are supplied, the College may contact the person who raised the concern during its assessment or enquiries.

10.3 Where possible, the College will acknowledge receipt of a concern within 10 working days. Concerns submitted to the dedicated confidential mailbox at raisingconcerns@swc.ac.uk will receive an immediate automated acknowledgement.

10.4 Enquiries about a concern should normally be directed to the College Speak Up Champion(s) or other contact handling the matter. Depending on the nature and requirements of the enquiries, the College may provide an additional or alternative contact point for the duration of the assessment or investigation.

10.5 The person who raised the concern may be offered an opportunity to meet with an appropriate College representative and will be advised whether any further participation or information may be required during the enquiries or any subsequent investigation.

10.6 Where it is necessary or appropriate to refer or report the matter to another authority, such as the Department for the Economy, the Northern Ireland Audit Office or the Police Service of Northern Ireland, the College will inform the person who raised the concern insofar as it is able to do so.

10.7 If the concern leads to criminal proceedings, the person who raised it may be required to provide a witness statement or give evidence in a court of law.

10.8 The College will tell the person who raised the concern when its enquiries have concluded. Insofar as the College is able, it will also provide an appropriate update on the outcome and any action arising. Detailed information may be withheld where disclosure would breach a duty of confidence, data protection requirements, legal obligations, the rights of another person or the integrity of related proceedings.

11. Outcome

11.1 The College will advise the person who raised the concern when its assessment or investigation has concluded. Where possible, it will provide an appropriate summary of the outcome and any action taken or proposed. The information provided may be limited to protect confidentiality, personal information, legal obligations, the rights of others or the integrity of related proceedings.

11.2 Where a member of staff is dissatisfied with how their concern has been handled, they should raise this with the Director of Corporate Services. Where the concern relates to the Director of Corporate Services or another member of the Senior Leadership Team, the matter should be raised with the Secretary to the Governing Body. Where it relates to the Principal and Chief Executive or the Secretary to the Governing Body, it should be raised with the Chair of the Governing Body.

11.3 Where a learner, member of the public or other non-staff person is dissatisfied with the process by which their concern has been handled, they may raise the matter in the first instance under the College's Customer Complaints and Compliments Policy. Separately, an appropriate public-interest concern may be raised with the Department for the Economy's Fraud and Raising Concerns Branch where it relates to the College's senior management, governance arrangements, use of public funds or another matter within the Department's oversight responsibilities. A concern relating to public money or wider financial governance may also be raised with the Northern Ireland Audit Office. These external bodies will determine whether the matter falls within their respective remit and do not provide a general appeal against the College's findings.

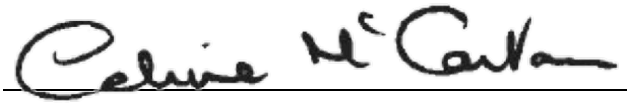
12. Data Protection

12.1 Concerns raised will be treated in the strictest confidence and all information is held securely in line with the requirements of the General Data Protection Regulations.

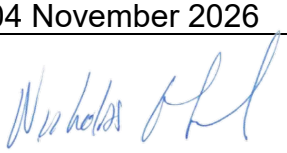
13. Policy Review

13.1 This Policy will be reviewed every three years or sooner if legislation, good practice, or government guidance dictates an earlier review.

13.2 The operation of this policy will be monitored annually by the Director of Corporate Services, including the number and nature of concerns raised, timeliness of acknowledgement and assessment, investigation outcomes, actions taken, themes or trends identified, learning arising, and any required improvements to controls, training, communication or organisational culture. A summary of annual monitoring will be reported to the Audit & Risk Committee as part of the College's governance and assurance arrangements.

Signed Principal and Chief Executive: 

Date: 04 November 2026

Signed Chair of the Governing Body: 

Date: 04 November 2026

Appendix 1: Template for Reporting a Concern to DfE

OFFICIAL - SENSITIVE

DEPARTMENT FOR THE ECONOMY

FRAUD & RAISING CONCERNS NOTIFICATION FORM

*NB: To be completed **as soon as possible** after the receipt of any allegation of concern, regardless of the nature of the allegations or their source.*

Please provide as much information as possible and e-mail the completed form to Fraud & Raising Concerns Branch at raising.concerns@economy-ni.gov.uk, cc'd to the Director of the relevant business area / Partner Team.

	Departmental casereference number (assigned by Fraud & Raising Concerns Branch):	
	Partner Organisation case reference number (if appropriate)	
A1	Date allegation/disclosure received in the departmental business area/Partner Organisation:	
A2	Details of the allegation / disclosure (including type of communication e.g. telephone call/email):	
A3	Name & contact details of person raising the allegation/concern (if known):	
A4	Was confidentiality requested by the person raising the concern?	
A5	Date on which an acknowledgement of receipt was issued to the person raising the allegation/concern. If correspondence has not yet been acknowledged in writing, please state this	
A6	Name & contact details of officer who received the allegation / disclosure:	
A7	Division / Business Area / Partner Organisation to which allegation / disclosure relates:	
A8	Details of the specific location at which the incident occurred:	
A9	Details of any documents (electronic or hard copy) received with allegation: NB: Please forward all documentation with this notification, including any written record of a telephone call.	
A10	Date fraud / concern was first discovered:	

	Departmental casereference number (assigned by Fraud & Raising Concerns Branch):	
A11	Estimated or actual value of monies at risk through the suspected fraud / concern:	
A12	Has the PSNI been notified? If so, please provide date of referral, details of investigating officer and case reference number	
A13	Name & details of contact person for ongoing correspondence / progress updates:	
A14	Is the case being reported as actual, suspected or attempted fraud:	
A15	Type of fraud / suspected fraud (see note 1):	
A16	Cause of fraud / suspected fraud (see note 2):	
A17	How was the fraud /suspected fraud discovered (see note 3):	
A18	Who perpetrated the fraud/suspected fraud (see note 4):	
A19	Category of any other action taken (see note 5):	
A20	Specific detail of any other action taken:	

When enquiries / investigations are finalised, a **Fraud & Raising Concerns Case Closure Summary** must be completed as fully as possible and sent to the Fraud & Raising Concerns Branch at raising.concerns@economy-ni.gov.uk, cc'd to the Director of the relevant business area / Partner Team.

Notes

1. Type of fraud
   - Grant related
   - Theft of assets (please state type of asset e.g. cash, laptop, oil, tools, camera)
   - Payment process related
   - Income related
   - Pay or pay related allowances
   - Travel and subsistence
   - Pension fraud
   - Contractor fraud
   - Procurement fraud
   - False representation

- Failure to disclose information
- Abuse of position
- Other (please specify)

2. Cause of fraud
   - Absence of proper controls
   - Failure to observe existing controls
   - Opportunistic
   - Unknown

3. Means of discovery of fraud
   - Normal operation of control procedures
   - Whistleblowing (internal or external)
   - Internal Audit
   - External
   - Computer analysis/National Fraud Initiative
   - Other means (please specify)

4. Perpetrators of Fraud
   - Internal staff member
   - Contractor
   - Funded body/grant applicant
   - Other third party (please specify)
   - Collusion between internal and external parties
   - Too early to determine
   - Unknown

5. Other actions taken
   - Controls improved
   - Control improvements being considered
   - Too early to determine
   - No action possible
   - Disciplinary action
   - Prosecution

Related Documentation

Title	Location	Owner
Procedure for Raising a Concern	Gateway	Risk & Compliance Officer
Fraud Policy and Response Plan	Gateway	Risk & Compliance Officer
Customer Complaints Policy	Gateway	Risk & Compliance Officer
Grievance Procedure	Gateway	Head of People & Culture
Equal Opportunity Policy	Gateway	Head of People & Culture
Disaster Management Policy	Gateway	Director of Corporate Services
Dignity at Work Policy	Gateway	Head of People & Culture
Employee Standards Policy	Gateway	Head of People & Culture

Change Log

Location	Change from deletion/addition	Change to
Title	Existing Freedom to Speak Up: Raising a Concern Policy	Policy renamed Raising Concerns Policy.
Whole policy	Policy comprehensively reviewed and reworked using the Department for the Economy Raising Concerns Policy as the template.	Restructured and rewritten the policy to align its flow, terminology and key provisions with the DfE Raising Concerns Policy, adapted for South West College's status as a DfE Partner Organisation. Incorporated SWC-specific scope, Speak Up Champions, internal and Governing Body reporting routes, handling and communication arrangements, outcome and escalation provisions, data protection, monitoring and related College policies. Updated external contacts and guidance, including DfE, NIAO and Protect, and replaced legacy terminology with Raising Concerns wording.
Sections 1-5	Existing introduction, scope, definitions, protections and advice arrangements	Updated to clarify the scope of the policy, statutory protections for protected disclosures, protection from detriment, and the advice and support available to those considering raising a concern.
Sections 6–8	Existing reporting, handling and Speak Up Champion arrangements	Reporting and handling arrangements streamlined and clarified, including internal and Governing Body escalation routes, the role and responsibilities of Speak Up Champions, referral to other procedures where appropriate, and a strengthened focus on organisational learning and culture.
Section 10	Existing outcome arrangements	Outcome and escalation arrangements clarified, including separate routes for staff, learners and other external stakeholders where dissatisfied with how a concern has been handled.
Section 12	Limited monitoring arrangements	Annual monitoring and reporting arrangements introduced to strengthen governance and assurance, including reporting to the A&R Committee and consideration of themes, trends and organisational learning.

Communication

Who needs to know (for action)	All Staff
Who needs to be aware	All Staff

Communication Plan

Action	By Whom	By When
Upload to Gateway and Website	Executive Support Officer	On approval
Circulation to key staff	Director of Corporate Services	On approval

Document Development

Details of staff who were involved in the development of this policy:

Name	Role
Joanne Lucas	Risk & Compliance Officer
Eimear Rushe	Head of HR
Elizabeth Shackels	Quality & Improvement Manager
Catherine McCrory	Equality Officer

Details of staff, external groups or external organisations who were consulted in the development of this policy:

Name	Organisation	Date
Forum for Engagement	SWC	21/10/20
Union Representatives		21/10/20
Senior Management Team	SWC	
Donal Collins	Equality Commission	23/10/20
Heads of Department	SWC	11/10/23
Fraud & Raising a Concern Branch	DfE	16/10/23

Approval Dates

Approved by	Date
Governing Body	04 November 2026

Document History

Issue no. under review	Date of review:	Persons involved in review	Changes made after review? Yes/No If Yes refer to change log	New Issue No.	If changes made was consultation required?	If changes made was Equality Screening required?
V1.0	November 2021	Risk & Compliance Officer	Yes	V2.0	No	No
2.0	October 2023	Risk & Compliance Officer Heads of Department DfE Fraud & Rasing a Concern Branch	Yes	V3.0	No	No
V3.0	April 2024	Principal and Chief Executive DfE Fraud & Raising a Concern Branch	Yes	V3.1	No	No
V3.1	June 2026	Director of Corporate Services – advice from DfE policy	Yes	V4	No	No