



## CSC Whistleblowing Policy and Procedure

### 1. Policy

- 1.1 Individuals engaged by the CSC may on occasion have concerns that there is something within the CSC which is not right, for example, in relation to financial practice, compliance with legislation or variation from standards of good governance and ethical practice. The CSC encourages individuals to raise such concerns without fear that their own position within the CSC may be jeopardised.
- 1.2 This policy sets out the way in which individuals may raise any concerns that they have regarding the CSC and how those concerns will be dealt with.

### 2. Background

- 2.1 The Public Interest Disclosure Act 1998 provides the legal framework for the protection of individuals who make a 'protected disclosure' from any form of detriment, discrimination or victimisation.
- 2.2 The Public Interest Disclosure Act 1998 applies to all individuals who are designated as 'workers' under the Employment Rights Act 1996 and extends to workers employed by any organisation engaged by the CSC.
- 2.3 Whilst Scholars, Fellows and Alumni are not designated workers, the CSC extends the principles of this policy to cover disclosures made by these individuals in respect to 2.4 below.
- 2.4 A protected disclosure is one made in good faith by an individual who has a reasonable belief that:
  - a criminal offence;
  - a miscarriage of justice;
  - an act creating serious risk to health and safety;
  - an act causing serious damage to the environment;
  - a breach of any other legal obligation (other than employment contract); or
  - concealment of any of the above;...is being, has been, or is likely to be, committed.
- 2.5 If you make a protected disclosure you have the right not to be dismissed, subjected to any other detriment, or victimised, because you have made a disclosure. The CSC will take all reasonable steps to ensure that confidentiality is maintained in such cases, and that those making allegations are not disadvantaged in any way by doing so.
- 2.6 Personal grievances (for example bullying, harassment, discrimination) are not covered by whistleblowing law, unless your particular case is in the public

interest. These should be reported under an employer's grievance policy.

### **3. Principles**

- 3.1 Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Staff and others working on behalf of the CSC should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.
- 3.2 Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation will be reported back to the person who raised the issue.
- 3.3 No employee or other person working on behalf of the CSC will be victimised for raising a matter under this procedure.
- 3.4 Victimisation of an individual for raising a qualified disclosure will be a disciplinary offence.
- 3.5 Maliciously making a false allegation is a disciplinary offence.
- 3.6 An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, you should not agree to remain silent. You should report the matter.

### **4. Procedure**

- 4.1 The procedure to follow to make a protected disclosure depends on the organisation for which the individual is employed or appointed.

#### **4.2 CSC Commissioners:**

The DFID Internal Audit Department's (IAD) Internal Audit Investigations Section is the central point for raising concerns, suspicions and/or allegations of fraud, sexual exploitation and abuse or other corrupt practices. This includes both internal and external cases where DFID funds, assets or interests (including DFID's reputation) are involved, as well as any breach of the Civil Service Code.

IAD's Internal Audit Investigations Section has a dedicated secure email address for raising all concerns [reportingconcerns@dfid.gov.uk](mailto:reportingconcerns@dfid.gov.uk) or by calling the confidential hotline on +44 (0)1355 843747 or by writing to the Head of Internal Audit, 22 Whitehall, London, SW1A 2EG, United Kingdom

#### **4.3 CSC Secretariat staff:**

Association of Commonwealth Universities' Whistleblowing Policy: 'Duty to Report Misconduct'

#### **4.4 British Council staff:**

British Council's Whistleblowing Policy: 'Raising Concerns'

#### **4.5 Other Parties (including nominating agency staff, Scholars, Fellows and Alumni):**

The suspicion should be raised in the first instance with the organisation concerned, according to their organisation's Whistleblowing policy.

## **5. Further Action**

- 5.1 If you are concerned that your organisation has failed to make a proper investigation or has failed to report the outcome of the investigations to the relevant person, you should escalate the matter to the Chair of the Commission, either by email to [complaints@cscuk.org.uk](mailto:complaints@cscuk.org.uk) or by post to Commonwealth Scholarship Commission, Woburn House, 20-24 Tavistock Square, London, WC1H9HF, United Kingdom. The Chair will arrange for a review of the investigation to be carried out, make any necessary enquiries and make their own report to the CSC.
- 5.2 Where it would not be appropriate to raise concerns with the CSC, or an unsatisfactory response has been given when the concerns were raised directly with the CSC, a report should be submitted to the DFID Internal Audit Investigations Section by email at [reportingconcerns@dfid.gov.uk](mailto:reportingconcerns@dfid.gov.uk) or by calling the confidential hotline on +44 (0)1355 843747 or by writing to the Head of Internal Audit, 22 Whitehall, London, SW1A 2EG, United Kingdom.
- 5.3 If the Chair of the CSC deems it not to be appropriate to handle the investigation within the CSC, then DFID Internal Audit Investigations Section will be contacted.
- 5.4 The CSC strongly encourages individuals to use the internal procedures of their employing or appointing organisation. However, where an individual feels that the above stated procedures have not been successful or are inappropriate, the Public Interest Disclosure Act makes provision for individuals to take their concerns to one of more than thirty prescribed regulatory organisations. You can find the full list in The Public Interest Disclosure (Prescribed Persons) Order 2014:  
[www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/496899/BIS-16-79-blowing-the-whistle-to-a-prescribed-person.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/496899/BIS-16-79-blowing-the-whistle-to-a-prescribed-person.pdf)

In addition, free independent advice can be obtained from the charity Public Concern at Work on 020 7404 6609 ([www.pcaw.org.uk](http://www.pcaw.org.uk)).

## **6. Provision to safeguard reputational damage**

Where an individual has strongly held concerns regarding management action and potential serious damage that action might have to the CSC's reputation, and where that individual has exhausted the relevant grievance procedure, they should raise their concern with the Chair of the Commission or the Chair of the Audit and Risk Management Committee. Any individual raising such concerns genuinely and sincerely will not be subject to disciplinary procedure if raised in this way.

## **7. Reporting fraud, bribery and corruption**

For any suspicions or allegations of fraud, bribery or corruption related to the activities of the CSC or associated persons of the CSC, please refer to the CSC Anti-Fraud, Bribery and Corruption Policy and Procedure.

## **8. Reporting Safeguarding incidents**

To report any safeguarding incidents related to activities of the CSC, please refer to the CSC Safeguarding Policy

