

## 1 POLICY STATEMENT:

The quality of our qualifications is maintained via a robust and rigorous process of quality assurance procedures to protect the delivery, award, and integrity of our qualifications. KCL is committed to conducting its business with honesty and integrity at all times. If, at any time, this commitment is not respected or appears to be in question, KCL will endeavour to identify and remedy such situations.

It is the company's policy to ensure that when a person has reasonable grounds to believe that any staff, learner or any other person related to the company has committed, or is about to commit, an offence that could harm the company's business or reputation, it denounces the wrongdoers in question. A key part of this process is to make sure we provide opportunities for KCL to be informed of any malpractice or wrong-doing with respect to our qualifications.

## 2 AIM OF THE POLICY

- Encourage employees, partners or managers to disclose this information or behaviour.
- Protecting complaints from reprisal.
- Treated all parties to an investigation in a fair and equitable manner.
- To discourage misconduct.
- To ensure confidentiality as much possible.
- Take corrective and disciplinary action if wrongdoing is discovered.
- The purpose of this whistleblowing policy is to encourage current and former employees, Learners, contractual third parties or partners to communicate events that raise serious concerns about KCL.
- KCL encourages and will support staff who report staff who report illegal practices or individuals who violate organisation's policies.

## 3 SCOPE

This policy applies to all employees and learners of KCL, as well as contractual third parties or partners doing business.

## 4 DEFINITIONS

### 4.1 Whistleblowing

Whistleblowing is a term used when an individual discloses information relating to malpractice or wrongdoing and/or the covering up of malpractice or wrongdoing. The individual's employer often commits the malpractice or wrongdoing, although this is not necessarily the case.

## 4.2 Malpractice

Malpractice is any activity or practice, which deliberately contravenes regulations and compromises the integrity of the assessment process or the validity of certificates. Malpractice covers any deliberate actions, neglect, default or other practice that compromises, or could compromise the:

- Assessment process
- Integrity of a regulated qualification
- Validity of a result or certificate
- Reputation and credibility of KCL

Qualification or the wider qualification community Malpractice may include a range of issues from failure to maintain appropriate records or systems, to the deliberate falsification of records in order to claim certificates.

For the purpose of this policy this term also covers misconduct and forms of unnecessary discrimination or bias toward individual or groups of Learners.

## 4.3 Complaints and Appeals

Whistleblowing does not apply to either making a complaint or an appeal. A complaint is usually an objection and could relate to poor administration or customer service. For further information refer to the KCL Complaints Policy.

Appeals are generally made against the outcomes of assessment if it is felt the gap between the expected and actual result is far greater than was anticipated. For more information refer to the KCL Appeals Policy.

## 5 DUTY TO REPORT MISCONDUCT

It is the duty of all employees, contractual third parties or partners to report misconduct or suspected misconduct, including fraud and financial impropriety to the director. This includes misconducts such as but not limited to:

- Providing false or misleading information, or withholding material information on KCL financial statements, accounting, auditing or other financial reporting fraud or misrepresentation.
- Pursuit of material benefit or advantage in violation of KCL's conflict of interest policy.
- Misappropriation or misuse of KCL resources such as funds, supplies or other assets.
- Unauthorised alterations or manipulation of computer files.
- Destroying, altering, mutilating, concealing, covering up, or making any other false entry in any records may be connected to an official proceeding, in violation of the

state law or regulations or otherwise obstructing, influencing or impeding any official proceeding in violation of state law or regulations.

## 6 PROCEDURE

### STAGE 1:

If there is a concern that malpractice has taken place in relation to a KCL, normal practice is to raise it through the line manager. For a Learner the first point of contact would be the main Trainer/Assessor.

### STAGE 2:

If your concerns are not addressed at this stage, or you feel it is not possible to raise concerns through first point of contact, you should complete the KCL Whistleblowing Report Form (see Appendix A), email it to: [info@kingdomcollege.org.uk](mailto:info@kingdomcollege.org.uk) or post to the Director, Office 14 Ealing House, 33 Hanger Lane, London, United Kingdom, W5 3HJ.

### STAGE 3:

- You will receive an acknowledgement of your email.
- We will evaluate your concern and may ask for more evidence/information.
- We will update you on any course of action we plan/take within 15 working days of you raising your concern.
- We will inform the regulators and Awarding Body, as needed, of the issue raised, the course of action to be taken and keep them informed at all stages of the investigation.
- When the investigation is complete, we will tell you the outcome given the need to protect confidentiality, within 15 working days of the investigation conclusion.
- We will provide full details of the investigation/evaluation to:
  - ❖ The regulators
  - ❖ Any other Awarding Organisations

## 7 ACTING IN GOOD FAITH

Any person who files a complaint alleging malpractice or wrongdoing must act good in faith and have reasonable grounds to believe that the information disclosed indicates wrongdoing.

No employee, third party contractor or partner who makes a denunciation in good faith will be subjected to retaliation. Retaliation is any direct or indirect harmful action that threatens a person or is taken against a person who has reported an event or action. Anyone who retaliates against a person who has made a report in good faith is subjected to disciplinary action up to and including dismissal.

However, making allegations that are deemed unfounded and malicious or knowingly false may result in disciplinary actions up to and including termination of freelance or employment contract.

## 8 INVESTIGATION

All relevant cases, including suspicious but proven cases, will be reviewed and analysed by a competent person designated by a director. In some cases, this may involve an investigation by a legal adviser or accountant. All investigations will be kept confidential to the extent possible. Appropriate corrective action will be taken, if necessary, and the findings will be communicated to the whistle-blower and his or her Manager.

## 9 RESPONSIBILITY, AUTHORITY AND IMPLEMENTATION:

A Director has overall responsibility for the implementation of the whistle-blowing Policy.

## 10 REVIEW AND EVALUATION OF THE POLICY:

The Director has overall accountability for the review and evaluation of the Whistle-blowing Policy. The Policy is presented to the Directors for ratification annually.

**Last Reviewed date:** 01-08-2023

**Next Review Date:** 01-07-2024

Mark Simpkins, Chair of the Advisory Board



