

Raising Concerns Response Plan SOP

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2022/2023 onwards

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Responsible Owner:

Chief Human Resources Officer

Summary of Contents

Guidance on procedures to be used if a concern is raised.

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1.0 Change History

Changes to this SOP are documented in Appendix 1 of this document. When reading electronic copies of this document, [you can click here to view the change history](#)

2.0 Background and Introduction

2.1 The College has prepared this Raising Concerns Response Plan to act as a procedural guide and provide a checklist of the required actions, in the event a concern is raised under the College's Raising Concerns Policy. A flow chart setting out the key elements of the process is included at Appendix 1.

3.0 Stage 1 - Initial Reporting

3.1 Concern raised by staff member¹

Action required by staff member wishing to raise a concern.

- 3.1.1 If a staff member wishes to raise a concern, they must notify their Head of School or Unit either orally or in writing and copied to the Chief Human Resources Officer.
- 3.1.2 If it is not appropriate to raise the concern with their Head of School or Unit the matter should be raised with a member of the College Management Team.
- 3.1.3 If it is not appropriate to raise the concern with a member of the College Management Team the matter can be raised with the Governing Body, via the Secretary to the Governing Body who can be contacted at governingbodysecretary@serc.ac.uk or via the College's dedicated confidential mailbox: raisingconcerns@serc.ac.uk
- 3.1.4 If the individual feels unable to raise a concern to the College directly, the matter can be raised to the College's Sponsoring Department, Department for the Economy, via its dedicated mailbox, managed confidentially by the Department's Fraud and Raising Concerns Branch. Email: raising.concerns@economy-ni.gov.uk Phone: 028 9025 7466

Action required by management to whom concern is reported.

- 3.1.5 The Head of School or Unit must report the matter to the Chief Human Resources Officer (CHRO). Where a concern has been raised orally, the Head of School/Unit must document the complaint and forward it to the CHRO.
- 3.1.6 The Head of School or Unit is not required to undertake preliminary enquiries regarding the concern.

3.2 Concern raised by Non-staff Member.

Action required by non-staff member wishing to raise concern.

- 3.2.1 Any non-staff member, e.g., student, member of the public can raise a concern using the College's dedicated confidential mailbox: raisingconcerns@serc.ac.uk.
- 3.2.2 If the individual feels unable to raise a concern to the College directly, the matter can be raised to the College's Sponsoring Department, Department for the Economy, via its dedicated mailbox, managed confidentially by the Department's Fraud and Raising Concerns Branch. Email: raising.concerns@economy-ni.gov.uk Phone: 028 9025 7466

¹ Includes Governor, contractor, agency worker, volunteer or independent consultant.

3.3 Anonymous Concerns

Concerns received anonymously will be treated in accordance with this procedure, as far as is reasonably practicable.

4.0 Stage 2 - Initial Assessment

4.1 The Chief Human Resources Officer (CHRO) shall be responsible for overseeing the process and for making an initial assessment about the appropriate course of action which may include:

- investigation by a nominated investigating officer;
- referral to the Police;
- independent inquiry undertaken by the Colleges Internal/External auditors;
- referral to the Department for the Economy or other appropriate public body.

4.2 Where it is not considered appropriate for the CHRO to oversee the process, the matter will be referred to the Principal and Chief Executive/Chair of Audit Committee as appropriate, who will apply the procedure as outlined above.

5.0 Stage 3 – Notification

5.1 On conclusion of the initial assessment. The CHRO or the individual appointed to oversee the process shall take the following action:

- a. Where an investigation has been deemed necessary, appoint an investigating officer in accordance with the College's SOP for conducting investigations.
- b. Advise the person who made the disclosure:
 - i. how the matter is being dealt with;
 - ii. they may be required to attend additional meetings in order to provide further information.
 - iii. the timescale for completing the investigation, if appropriate.
- c. Using the appropriate template, Appendix 2, notify the Department for the Economy, copied to the Principal and Chief Executive and Chair of the Audit Committee.

6.0 Stage 4 – Investigation

6.1 The CHRO/individual appointed to oversee the process shall have overall responsibility for the independence and integrity of the investigation and in that regard is responsible for ensuring;

- i. the investigation is conducted sensitively and speedily as possible;
- ii. sufficient resources are available to undertake the investigation;
- iii. access is provided to all appropriate records, personnel, premises as required to fully investigate the matter.

6.2 The person or persons against whom the disclosure is made will be advised of the disclosure at the appropriate juncture, the evidence supporting it and will be allowed to respond before any decision or outcome is reached.

6.3 It is essential that, in each case, the actions taken are proportionate, effective and timely, with the rationale for each course of action clearly documented. The investigating officer must keep a full record of the detail of all enquiries, evidence gathered, and conclusions reached.

- 6.4** If, at any time, the investigating officer suspects or uncovers fraud, enquiries will temporarily cease to allow consideration of subsequent actions, such as the potential involvement of the Police Service of Northern Ireland (PSNI). The College's Fraud Response Plan must be employed, with notification of Fraud / Suspected Fraud completed and sent to DfE'S Fraud & Raising Concerns Branch and the Director of FE.
- 6.5** During the course of an investigation, all staff have a responsibility to co-operate with requests for assistance, information, and documentation.
- 6.6** The investigating officer, on conclusion of their investigation will prepare a written report to the CHRO/person appointed to oversee the process. Where appropriate the report will cover:
- a summary of the evidence obtained in respect of each objective;
 - a clear conclusion on each objective;
 - quantification of any losses;
 - any control issues identified;
 - if the report is being referred to HR for consideration of disciplinary action;
 - if the report is being referred to the PSNI for consideration of prosecution; and
 - any follow up report to Internal Audit in respect of control matters identified.

7.0 Stage 5 – Outcome of Investigation

- 7.1** On receipt of the Investigation Report the CHRO/individual appointed to oversee the process shall determine the appropriate action to be taken which may include:
- a. the use of an internal procedure such as:
 - i. Disciplinary
 - ii. Grievance or complaints
 - iii. Harassment
 - iv. Fraud
 - b. referral to an external body such as Police, Health and Safety Executive, Information Commissioner or the Department for the Economy.

8.0 Stage 6 – Post Investigation Action

- 8.1** The CHRO/individual appointed to oversee the process shall be responsible for:
- i. providing feedback to the person who made the disclosure;
 - ii. providing feedback to the person(s) against whom the disclosure was made;
 - iii. ensuring any recommendations are actioned and reviewed;
 - iv. ensuring a brief report of all disclosures (not identifying individuals) and any subsequent actions taken and/or lessons learnt is submitted to the Governing Body;
 - v. Notifying the Department for the Economy using the appropriate template, Appendix 3.

8.2 If an individual is not happy with the way that the concern has been handled, they can raise it with the Principal and Chief Executive. In the event the concern related to the Principal and Chief Executive, the individual may raise the matter with the Chair of the Governing Body or the Chair of the Audit Committee.

9.0 Communication Plan

This Procedure will be uploaded to the College intranet and referred to in staff induction and training.

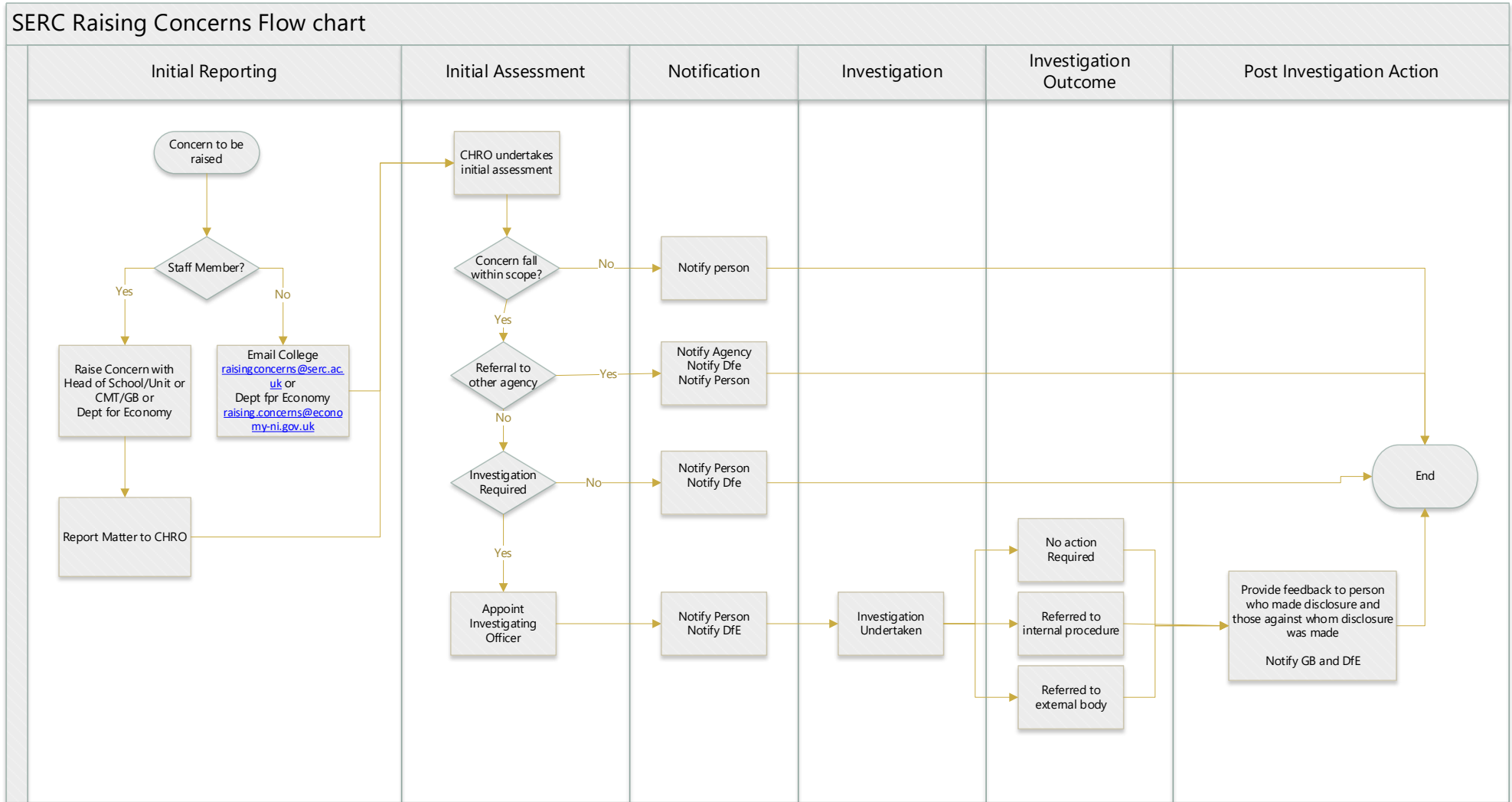
10.0 Review

This procedure will be reviewed annually, or when the need for change has been identified.

Appendix 1: Document Change History

Version	Date	Change Detail
1.0	Oct 2021	Created
1.1	Sept 2022	Title Page amended to reflect new review date. Para 3.1.3 amended to permit internal staff to raise a concern via the College's dedicated mailbox. Para 5.3 to 5.6 added to outline details of the investigation process
1.2	August 2023	Transferred to new Accessibility Template
1.3	August 2023	Reviewed and no changes necessary

Appendix 2: Raising Concerns Flow Chart



Appendix 3: Notification of Raising Concern

OFFICIAL SENSITIVE

NOTIFICATION OF A RAISING CONCERN

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 Division.

	Departmental case reference number (assigned by Fraud and Raising Concerns Branch):	
A1	Date disclosure received in the department:	
A2	Details of the disclosure (including type of communication e.g. telephone call /):	
A3	Name & contact details of person raising the concern (if known):	
A4	Name & contact details of officer to whom disclosure was notified:	
A5	Division / Branch / details of body (e.g. HE institution, FE college, NDPB, etc) to which the disclosure relates:	
A6	Details of the location at which the disclosure incident occurred:	
A7	Date the disclosure incident discovered:	
A8	Details of any financial implication (actual or potential):	
A9	Details of any documents (electronic or hard copy) received with disclosure: NB: Please forward all documentation with this notification, including any written record of a telephone call.	
A10	Was confidentiality requested by the person raising the concern?	
A11	Has the PSNI been notified? If so, please provide date of referral, details of investigating officer and case reference number.	
A12	Details of any other action taken (e.g. controls improved):	
A13	Name & contact details of the manager of the relevant business area / sponsor team (contact point for ongoing correspondence / progress updates):	

When enquiries / investigations are finalised, a **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 Division.

Appendix 4: Fraud & Raising Concern – Case Closure Summary

OFFICIAL SENSITIVE

DEPARTMENT FOR THE ECONOMY

FRAUD & RAISING CONCERNS – CASE CLOSURE SUMMARY

Post Investigation Outcome & Action

NB: To be completed by the relevant business area **as soon as possible** after the completion of enquiries / investigation into any allegation made under the Fraud Response Plan or Raising Concerns Procedures

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 Division.

	Departmental case reference number (assigned by Fraud & Raising Concerns Branch):	
B1	Date Investigation Report completed (please attach a copy):	
B2	Date of final case closure:	
B3	Outcome of enquiries / investigation: <ul style="list-style-type: none">- no irregularity- irregularity found (other than fraud)- fraud attempted but prevented- actual fraud	
B4	Summary of findings of the investigation:	
B5	If an irregularity / fraud was found, who was responsible? <ul style="list-style-type: none">- Internal staff member- Contractor- Funded body / grant applicant- Other third party (please specify)- Collusion between internal and external parties- Unknown	
B6	If relevant, date and details of feedback given to the person who made the initial disclosure:	
B7	Was there a financial loss to the department/ALB? If appropriate, provide details of the financial implications of the disclosure - quantify any loss:	
B8	If any loss was incurred, is recovery being sought?	

B9	If appropriate, quantify amount recovered to date:	
B10	Type of action taken as a result of the investigation: <ul style="list-style-type: none"> - Controls improved - Control improvements being considered - Too early to determine - No action necessary / possible - Disciplinary action - Referred for prosecution 	
B11	Specific details of actions taken to address issues arising from the investigation:	
B12	If no action is deemed necessary, please confirm if a similar irregularity or fraud has occurred in the organisation within the last 5 years:	
B13	Date and details of referral to other parties / organisations e.g. another department or PSNI:	
B14	If referred to the PSNI, please provide case reference number and summary of action taken:	
B15	Name & contact details in case further information is required:	
B16	Notes / further information:	