



# SEADREAM

Science & Engineering Around Devon; Research, Education And More!  
[www.seadreameducation.com](http://www.seadreameducation.com)

## WHISTLEBLOWING POLICY

**Last Review: June 2021**

**Date due for Review: June 2023**

### Whistleblowing

This policy sets out processes for Seadream representatives (staff and volunteers) who report colleagues they believe are doing something wrong or illegal.

All Seadream representatives are to be treated equally and fairly. Seadream will not tolerate the victimisation, intimidation or penalisation of anyone raising a genuine concern, anyone involved in the subsequent investigation or anyone acting as a witness. Anyone responsible for any such action against individuals making genuine disclosures will be the subject of disciplinary action.

The wrongdoing covered by this policy statement includes incidents where:

- Someone's health or safety is in danger.
- Damage to the environment.
- A criminal offence.
- Not obeying the law.
- Covering up a wrongdoing.
- Misuse of funds.
- Actions that negatively effect the welfare of individuals.

### Principles of whistleblowing

Seadream subscribes to the following principles:

- 1) The need for culture change.
  - Culture of safety and learning.
  - Raising concerns.
  - Culture free from bullying.
  - Culture of visible leadership.
  - Value staff who raise concerns.
  - Culture of reflective practices.
- 2) The need for improved handling of cases.
  - Informal and formal raising and resolution of concerns.
  - Prompt, swift, proportionate and blame free investigation.
  - Mediation and dispute resolution.

- 3) The need for measures to support good practice.
  - Equal support to those raising concerns.
  - Transparency accountable.

### **Reporting your concern**

Dr Juliette Jackson and Dr Jeanette Sanders are available to receive concerns.

Where Seadream representatives have concerns they should aim to report the concern internally before turning to an external prescribed body.

Making a report to a body external to Seadream may only be undertaken where the whistle blower thinks the organisation will cover the concern up, would treat them unfairly if they complained, or have raised the matter before but the concern hasn't been dealt with.

Prescribed bodies include the NSPCC or the 'Public concern at work' – [www.pcaw.org.uk](http://www.pcaw.org.uk)

The whistleblower must meet specified criteria so that that their disclosure can be considered a qualifying disclosure under the PIDA Act. These are as follows:

- The disclosure must be made to an appropriate person (i.e. a Seadream Director)
- The person making the claim must have reasonable belief that wrongdoing is being or is about to be committed.
- The disclosure must reasonably believe it to be substantially true and that the disclosure is in the public interest.
- The person making the claim should not collect the information to support the allegations improperly.

### **Malicious Whistleblowing**

Where it is found that the whistle-blower makes an allegation(s) maliciously, and:

- Does not act in the public interest;
- Makes an allegation without reasonable grounds for believing it to be substantially true;
- Collects information to support the allegations improperly, or;
- Makes an allegation for personal / 3rd party gain

they will be subject to formal disciplinary action, and in some cases may be subject to criminal investigation where illegality has occurred to achieve those aims. In addition, if an employee engages in improper conduct in relation to whistleblowing, they are unlikely to be protected as a whistle-blower under the PIDA Act.

### **Handling the whistleblower's report.**

A meeting between the whistleblower and the Appropriate Person (person to whom report was submitted) will be held within a reasonable timeframe. The whistleblower may bring a companion if desired. The meeting will explore the report and any action points arising thereafter.

The meeting will be documented and then a redacted report (the whistleblower to remain anonymous) shared with other Seadream Directors – except any who are subject to the whistleblower report. The Appropriate Person will carry out an investigation and report findings, together with any recommendations for action, to the whistleblower and other Directors,.

If the whistleblower is dissatisfied with the findings, they will be provided with the contact details for "Public Concern at Work" or its equivalent.