



Information for Whistleblowing, Complaints and Grievances: Using Speak Out

Why does Milton Keynes College need a system to deal with Whistleblowing, Complaints and Grievances?

We believe that our employees and our students are our most important assets. By creating open channels of communication, we can promote a positive work environment and maximise learning outcomes.

We believe an anonymous reporting vehicle helps MK College meet its professional and statutory requirements to address accounting and auditing fraud directly with the audit committee and deal with other misconduct appropriately.

An effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making and reporting. We have partnered with EthicsPoint to provide this service.

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global to assist management and employees work together in addressing fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

Reporting – General

May I report using either the Internet or the telephone?

Yes. With EthicsPoint, you have the ability to file a confidential, anonymous report via either the telephone or the Internet.

The free Speak Out Hotline Number is 0800 0698395.

What type of situations should I report?

The EthicsPoint system is designed for employees, students or other members of the community to report any violation of our Professional Standards or Student Code of Conduct, or other concern, complaint or grievance that may arise.

As an employee, if I see a violation, shouldn't I just report it to my manager, security, or human resources and let them deal with it?

When you observe some behaviour that you believe violates our code of conduct, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager, or other member of our management team. We recognise, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances

that we have partnered with EthicsPoint. We would rather you report anonymously than keep the information to yourself.

Why should I report what I know? What's in it for me?

We all have the right to work and study in a positive environment and we want to make sure we are contributing well to the communities we serve. With this comes the responsibility of acting in an ethical manner and letting the appropriate people know if someone is not acting as they should. By working together, we can maintain a healthy and productive environment. Corporate misconduct or shortfalls in standards can threaten the livelihood of the entire College.

Does management really want me to report?

We certainly do. In fact, we need you to report. You know what is going on in the College and in the prisons in which we provide education services - both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimise the potential negative impact on the College, our people and our communities. Also, offering positive input may help identify issues that can improve our culture and performance.

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to specific individuals within the College who are charged with determining what happens next, based on the type of violation, complaint or concern and location of the incident. Each of these report recipients has had training in handling these reports with the utmost confidence.

Isn't this system just an example of someone watching over me?

The EthicsPoint system concentrates on being a positive aspect of our overall philosophy and our College values. It allows us to assure a safe, secure, and ethical workplace and learning environment. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. Effective communication is critical for everyone at the College, wherever they are based, and this is a great tool to enhance that communication.

We have carefully chosen the best reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

Reporting Security & Confidentiality

It is my understanding that any report I send from a College computer generates a server log that shows every web-site that my PC connects with, and won't this log identify me as a report originator?

EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available. In fact, EthicsPoint is contractually committed not to pursue a reporter's identity.

If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside our work environment (such as one located at an Internet café, at a friend's house, etc.) through the EthicsPoint secure website. Many people choose this option, as EthicsPoint's data shows that fewer than 12% of reports are generated during business hours.

Can I file a report from home and still remain anonymous?

A report from home, a neighbour's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the EthicsPoint

system strips away Internet addresses so that anonymity is totally maintained. Plus, EthicsPoint is contractually committed not to pursue a reporter's identity.

I am concerned that the information I provide EthicsPoint will ultimately reveal my identity. How can you assure me that will not happen?

The EthicsPoint system is designed to protect your anonymity. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, "From my desk next to Jan Smith..." or "In my 33 years at MK College..."

Is the Speak Out hot line confidential and anonymous too?

Yes. You will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will type your responses into the EthicsPoint Web site. These reports have the same security and confidentiality measures applied to them during delivery.

What if I want to be identified with my report?

There is a section in the report for identifying yourself, if you wish.

Tips & Best Practices

I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?

MK College chooses to promote ethical and values driven behaviour. All unethical conduct, at any level, ultimately hurts the College, our employees and our students, including you. You only have to consider what you read in the news to see the disastrous effects that a seemingly harmless lapse in ethics can have on an otherwise healthy organisation. So if you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your colleagues and peers to report it.

I am not sure if what I have observed or heard is a violation of MK College policy, or involves unethical conduct, but it just does not look right to me. What should I do?

File a report. EthicsPoint can help you prepare and file your report so it can be properly understood. We'd rather you report a situation that turns out to be harmless than let possible unethical behaviour go unchecked because you weren't sure.

What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?

The EthicsPoint system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named.

What if I remember something important about the incident after I file the report? Or what if there are further questions for me concerning my report?

When you file a report at the EthicsPoint Web site or through the EthicsPoint Call Centre, you receive a unique user name and are asked to choose a password. You can return to the EthicsPoint system again either by Internet or telephone and access the original report to add more detail or answer questions posed by an MK College representative and add further information that will help resolve open issues. We strongly suggest that you return to the site in the time specified to answer questions. By using EthicsPoint to file your report, you have now entered into an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex.

Are these follow-ups on reports as secure as the first one?

All EthicsPoint correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

Can I still file a report if I don't have access to the Internet?

You can file an EthicsPoint report from any computer that can access the Internet. You can file from home. Many public locations, including the public library, have Internet computers. If you don't have access to or are uncomfortable using a computer, you can call the EthicsPoint free Speak Out hotline, which is available 24 hours a day, 365 days a year.