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# Staff Policy Manual

Higher Education · Performing Arts  
Validated by the University of West London

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## Document Control

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| <b>Document Title</b>                | Staff Policy Manual                                                                                                                                                                                    |
| <b>Institution Name</b>              | Triple Threat Training Limited (trading as GAMTA)                                                                                                                                                      |
| <b>Category</b>                      | Human Resources — Staff Policies and Procedures                                                                                                                                                        |
| <b>Approval Authority</b>            | Senior Management Team, on behalf of the Unibridge Group Board                                                                                                                                         |
| <b>Applies To</b>                    | All staff employed by Triple Threat Training Limited (trading as GAMTA), including academic, technical, professional-services and sessional staff                                                      |
| <b>External Regulatory Alignment</b> | Employment Rights Act 1996; Equality Act 2010; Acas Codes of Practice; Health and Safety at Work etc. Act 1974; Protection of Vulnerable Groups (Scotland) Act 2007; UK GDPR; Data Protection Act 2018 |
| <b>Related Documents</b>             | Staff Grievance Policy and Procedure; Staff-Student Relationships Policy; Safeguarding Policy; Harassment and Sexual Misconduct Policy                                                                 |
| <b>Document Status</b>               | Approved Institutional Document                                                                                                                                                                        |
| <b>Approved</b>                      | August 2026                                                                                                                                                                                            |

## Contents

## TRIPLE THREAT COLLEGE

### STAFF POLICY MANUAL

An integrated framework for staff conduct, working relationships, formal procedures, and public-interest disclosures

## Common Introduction to the Manual

1.1 Triple Threat Training Limited, trading as GAMTA (the “College”) is a performing arts college established in Scotland. The College employs and engages academic, technical, production, and professional staff, supported by visiting practitioners drawn from the dance, singing, acting, musical theatre, and wider performing arts professions. This Staff Policy Manual sets out the College’s integrated framework for the conduct of staff and the management of workplace matters.

1.2 The Manual comprises four Parts:

- Part A – Staff Dignity at Work Policy, which sets out the standards of behaviour expected of staff and the support available where those standards are not met;
- Part B – Staff Disciplinary Procedure, which applies where staff conduct or performance falls below the standards expected;
- Part C – Staff Grievance Policy and Procedure, which provides a route for staff to raise concerns about their employment;
- Part D – Whistleblowing Policy, which provides a confidential route for staff to disclose concerns about wrongdoing in the public interest, in accordance with the Public Interest Disclosure Act 1998.

1.3 The Manual operates alongside, and does not replace, the College’s wider Policies and Regulations, including the Harassment and Sexual Misconduct Policy, the Equality, Diversity and Inclusion Policy, the Privacy and Information Security Policy, the Safeguarding Policy, and the Code of Practice on Freedom of Speech and Academic Freedom. These remain standalone policies because they apply to the whole College community, not only to staff, and shall be read alongside the relevant Parts of this Manual.

1.4 This Manual has been developed having regard to the Acas Code of Practice on Disciplinary and Grievance Procedures, the Acas Guide on Discipline and Grievances at Work, the Equality Act 2010, the Employment Rights Act 1996, the Employment Relations Act 1999, the Public Interest Disclosure Act 1998, and applicable Scottish employment, safeguarding, and data protection law.

1.5 This Manual applies to all employees of the College, including academic, technical, production, and professional staff on any contractual basis. The Manual applies, with such adaptation as is appropriate, to workers and to self-employed visiting practitioners engaged by the College on a regular basis, where the matter arises from their engagement.

1.6 Common principles. The following principles apply across all Parts of this Manual:

- Fairness and natural justice: the person concerned shall be informed of the matter, given a reasonable opportunity to respond with supporting evidence, supported through the process, and notified of decisions in writing with reasons;
- Promptness: matters shall be handled within the timescales set out in each Part, with the person kept informed where delays arise for legitimate reasons;

- Impartiality: those involved in considering a matter shall have no prior decision-making involvement in it and no material conflict of interest;
- Confidentiality: matters shall be handled in confidence so far as reasonably possible, shared only on a need-to-know basis, and processed in accordance with the UK GDPR, the Data Protection Act 2018, and the Privacy and Information Security Policy;
- Right to be accompanied: at any formal meeting under Parts B or C, a staff member has the right to be accompanied by a colleague or by a trade union representative (whether or not the union is recognised), in accordance with the Employment Relations Act 1999;
- Reasonable adjustments: reasonable adjustments under the Equality Act 2010 shall be considered throughout, including in relation to meeting arrangements, communication, accessible venues, additional time, and support;
- Proportionality: the level of process applied shall be proportionate to the matter.

1.7 Common definitions. The following definitions apply throughout the Manual:

- “Working Day” means a day other than a Saturday, Sunday, public holiday in Scotland, or other day on which the College is closed;
- “HR” means the Human Resources function of the College, which may be discharged directly by the College or through a designated external provider;
- “Designated Officer” means the College Principal or such other senior officer as the Principal designates;
- “Companion” means a colleague or trade union representative accompanying a staff member to a formal meeting.

## **PART A — STAFF DIGNITY AT WORK POLICY**

### **A1. Purpose and Scope**

A1.1 GAMTA is committed to fostering a working environment in which all staff are treated with dignity and respect, and in which behaviour likely to undermine that environment is not tolerated. This Policy sets out the standards of behaviour expected of staff in their dealings with colleagues, visiting practitioners, contractors, and members of the College community.

A1.2 This Policy applies in all working contexts, including College premises, studios, rehearsal rooms, theatres, technical spaces, external venues, placements, online environments, and work-related social occasions.

A1.3 Conduct by staff towards students is addressed under the Harassment and Sexual Misconduct Policy and the Staff–Student Relationships Policy. Conduct between students is addressed under the Student Code of Conduct and Disciplinary Regulations. This Policy applies to conduct between staff and other adults in the working environment.

### **A2. Standards of Behaviour**

A2.1 Staff shall:

- treat colleagues, visiting practitioners, contractors, and members of the College community with courtesy, respect, and professionalism;
- communicate constructively, including in performance, rehearsal, technical, and production environments where artistic and operational demands may be intense;
- act consistently with the Equality, Diversity and Inclusion Policy and the Equality Act 2010, and challenge unacceptable behaviour where it is safe and appropriate to do so;
- act consistently with the Code of Practice on Freedom of Speech and Academic Freedom, recognising that the lawful expression of contested views does not, of itself, amount to a breach of this Policy;

- respect professional protocols in performance and rehearsal, including those relating to physical contact, intimacy, partnering, fight work, and the supervision of others.

### **A3. Unacceptable Behaviour**

A3.1 Unacceptable behaviour includes, but is not limited to:

- bullying, defined as offensive, intimidating, malicious, or insulting behaviour, or an abuse or misuse of power, that undermines, humiliates, or injures the recipient;
- harassment, defined under the Equality Act 2010 as unwanted conduct related to a protected characteristic that has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment;
- victimisation, defined as subjecting a person to detriment because they have done a protected act under the Equality Act 2010;
- aggressive, threatening, or intimidating conduct, including shouting, swearing at colleagues, or making threats;
- persistent or unreasonable criticism that goes beyond legitimate performance feedback;
- exclusion or marginalisation of colleagues from work activities, communications, or professional opportunities on grounds unrelated to legitimate operational decisions;
- abuse of authority, including the misuse of supervisory, casting, scheduling, or production decisions;
- sexual harassment and sexual misconduct, which are also addressed under the Harassment and Sexual Misconduct Policy.

A3.2 Performing arts context. The College recognises that performance, rehearsal, technical, and production environments may involve robust artistic direction, physical demands, intimacy work, fight work, and time pressure. Such pressures do not, however, justify behaviour that breaches this Policy. Conduct shall be assessed on its character, not on the artistic context in which it occurs.

### **A4. Sources of Support**

A4.1 Staff who experience or witness behaviour they consider may breach this Policy may seek support and advice from:

- their line manager or, where the matter concerns the line manager, the next level of management;
- Human Resources;
- the Office of the Principal;
- a trade union representative;
- the College's Employee Assistance arrangements where available.

### **A5. Resolution**

A5.1 Informal Resolution. Many matters can be resolved through direct conversation between the parties, with the support of a line manager or HR. Mediation, by a trained internal or external mediator, may be offered where both parties consent. Participation in mediation is voluntary and does not preclude formal action.

A5.2 Formal Resolution. Where informal resolution is not appropriate, has not succeeded, or is not preferred:

- a staff member experiencing the conduct may raise a formal grievance under Part C;
- the College may consider the conduct under the Staff Disciplinary Procedure at Part B;

- where the conduct may constitute sexual harassment or sexual misconduct, the matter shall be considered under the Harassment and Sexual Misconduct Policy.

A5.3 No Detriment. Staff who raise concerns in good faith under this Policy shall not be subjected to detriment for having done so.

## **PART B — STAFF DISCIPLINARY PROCEDURE**

### **B1. Purpose and Scope**

B1.1 This Procedure applies where the conduct or performance of a member of staff falls below the standards expected of them. It is intended to be fair, consistent, and proportionate, and to provide opportunities for improvement where appropriate.

B1.2 This Procedure applies to all employees of the College. It applies to workers and self-employed visiting practitioners only where their engagement gives rise to matters that the College reasonably needs to address through a formal process; otherwise the engagement may be ended in accordance with the contractual arrangements.

B1.3 This Procedure has been developed having regard to the Acas Code of Practice on Disciplinary and Grievance Procedures.

### **B2. Categories of Conduct and Performance Concerns**

B2.1 Misconduct includes, but is not limited to:

- breach of College policies and procedures;
- unauthorised absence or persistent lateness;
- failure to follow reasonable management instructions;
- inappropriate use of College facilities, IT systems, or resources;
- breach of confidentiality or data protection requirements;
- conduct outside work that brings the College into disrepute or affects the staff member's capacity to perform their role.

B2.2 Gross Misconduct includes conduct so serious that it may justify dismissal without notice, including:

- theft, fraud, or deliberate falsification of records;
- physical violence, threats of violence, or serious bullying;
- serious harassment, sexual harassment, or sexual misconduct (also addressed under the Harassment and Sexual Misconduct Policy);
- serious breach of safeguarding requirements (also addressed under the Safeguarding Policy);
- serious breach of data protection or information security requirements;
- attendance at work under the influence of alcohol or unlawful drugs in a manner that affects the safe performance of duties or the safety of others (including in rehearsal, studio, technical, or production settings);
- serious negligence causing or risking serious harm to others;
- conviction of a criminal offence relevant to the post or the College;
- breach of professional protocols in rehearsal, performance, or production settings, including breach of intimacy or contact protocols;
- serious breach of the Code of Practice on Freedom of Speech and Academic Freedom;
- acts that compromise the College's PVG Scheme obligations or that would result in barring from regulated work.

B2.3 Performance concerns relate to a staff member's capacity to perform their role to the required standard. Performance concerns are normally addressed initially through supportive management, including objectives, feedback, training, and review. Where performance concerns persist, they may be addressed through this Procedure.

### **B3. Investigation**

B3.1 Where a concern arises, an initial assessment shall be undertaken by HR, in consultation with the relevant manager and (where applicable) the Designated Officer. The assessment shall determine whether an investigation is required and, if so, by whom.

B3.2 An Investigator shall be appointed who has no prior decision-making involvement in the matter and no material conflict of interest. The Investigator may be a member of staff or an external investigator in complex cases.

B3.3 The Investigator shall:

- gather relevant evidence, including documents, communications, and witness statements;
- interview the staff member who is the subject of the investigation, with the right to be accompanied;
- interview other relevant persons;
- produce a written investigation report setting out the findings of fact and any recommendation on whether the matter should proceed to a hearing.

B3.4 The staff member shall be informed in writing of the nature of the allegation, that an investigation is taking place, and the support available. Investigations shall be completed as promptly as reasonably possible.

### **B4. Precautionary Suspension**

B4.1 In limited circumstances, it may be necessary to suspend a staff member from work pending investigation. Suspension is a neutral act, is not a sanction, and shall not be treated as a finding of any kind. Suspension shall be considered only where:

- there is a risk to other persons;
- there is a risk to the integrity of the investigation;
- there is a serious risk to property, College reputation, or operations.

B4.2 Suspension shall be on full pay (or, in the case of workers, on agreed terms), shall be authorised by the College Principal or by the Chair of the Unibridge Group Board where the matter concerns the Principal, and shall be reviewed at appropriate intervals. The shortest practicable period of suspension shall be used.

### **B5. Stages of the Procedure**

B5.1 Informal Resolution. Minor concerns may be addressed through an informal conversation with the line manager, with a record kept by the manager. Informal resolution is not a stage of the formal Procedure.

B5.2 Stage 1 – First Written Warning. Where a matter is established at hearing under Section B6 and the misconduct or performance shortfall is not sufficiently serious to warrant a higher sanction, a First Written Warning may be issued. The warning shall remain on file for normally twelve (12) months.

B5.3 Stage 2 – Final Written Warning. A Final Written Warning may be issued where the matter is more serious, where there is an active First Written Warning on file, or where misconduct or performance shortfall has continued. The warning shall remain on file for normally eighteen (18) months.

B5.4 Stage 3 – Dismissal or Other Sanction. Where a matter is sufficiently serious, where there is an active Final Written Warning on file, or where the conduct constitutes gross misconduct, the outcome may be:

- dismissal with notice or pay in lieu of notice;
- summary dismissal without notice in cases of gross misconduct;
- such other sanction as may be appropriate, including demotion (with the staff member's agreement), transfer to other duties, or a final written warning combined with conditions.

B5.5 The Procedure may be entered at any stage, depending on the seriousness of the matter.

## **B6. Disciplinary Hearing**

B6.1 Where a matter is to proceed to a disciplinary hearing, the staff member shall be notified in writing at least five (5) working days before the hearing, with information including:

- the allegation(s) and the supporting evidence (including a copy of the investigation report and any relevant documents);
- the time, date, place, and format of the hearing;
- the right to be accompanied by a Companion;
- the potential outcomes, including the possibility of dismissal where applicable;
- any reasonable adjustments available.

B6.2 Hearing Panel. The hearing shall be conducted by a manager of appropriate seniority with no prior decision-making involvement in the matter, supported by HR. For hearings where dismissal is a possible outcome, the hearing shall be conducted by the College Principal or a senior officer designated by the Principal. Where the matter concerns the Principal, the hearing shall be conducted by the Chair of the Unibridge Group Board or a senior governor designated by the Chair.

B6.3 Conduct of the Hearing. The staff member shall be given a full opportunity to put their case, refer to documents, call witnesses where reasonable, and respond to the evidence. The hearing may adjourn for further consideration or further information.

B6.4 Decision. The decision shall be reached on the balance of probabilities, having regard to all the evidence. The decision shall be communicated in writing with reasons normally within ten (10) working days of the hearing. The outcome letter shall explain the right of appeal.

## **B7. Appeal**

B7.1 A staff member may appeal a disciplinary decision in writing within ten (10) working days of receipt of the decision. The appeal shall set out the grounds, which may include procedural error, the unreasonableness of the decision in light of the evidence, the disproportionality of the sanction, or new evidence that could not reasonably have been submitted before.

B7.2 The appeal shall be heard by a senior officer who has not previously been involved in the matter and who is, where reasonably possible, more senior than the original decision-maker. Where the original decision was taken by the Principal, the appeal shall be heard by the Chair of the Unibridge Group Board or a senior governor designated by the Chair.

B7.3 The appeal hearing shall normally take place within fifteen (15) working days of receipt of the appeal. The right to be accompanied applies. The Appeal Hearer may confirm, vary, or rescind the original decision. The outcome shall be communicated in writing with reasons normally within ten (10) working days. The outcome of the appeal shall represent the final stage of internal procedure.

## **B8. Related Matters**

B8.1 Safeguarding. Where the conduct under consideration engages safeguarding concerns, the matter shall be coordinated with the Safeguarding Policy. The College may need to consider referral to Disclosure Scotland and to relevant Scottish statutory partners.

B8.2 Criminal Matters. Where the conduct may also constitute a criminal offence, the College may suspend internal proceedings to await the outcome of any police investigation or criminal proceedings, particularly where this would prevent prejudice to the criminal process. The College retains the right to proceed internally on the balance of probabilities.

B8.3 Sexual Misconduct. Where the conduct under consideration concerns sexual harassment or sexual misconduct, this Procedure operates alongside the Harassment and Sexual Misconduct Policy. Trauma-informed handling shall apply.

## **PART C — STAFF GRIEVANCE POLICY AND PROCEDURE**

### **C1. Purpose and Scope**

C1.1 This Part provides a fair and accessible route for staff to raise grievances and have them resolved promptly. A grievance is a concern, problem, or complaint raised by a staff member in connection with their employment. Common subjects include terms and conditions, working practices, working relationships, allocation of work, application of policies and procedures, and the working environment.

C1.2 This Part applies to all employees of the College and, with such adaptation as is appropriate, to workers and self-employed visiting practitioners engaged on a regular basis, in respect of matters arising from their engagement.

C1.3 This Part does not apply to:

- matters of unacceptable behaviour by a colleague, which are normally addressed under Part A (Staff Dignity at Work Policy) or the Harassment and Sexual Misconduct Policy;
- disciplinary matters concerning the staff member, which are addressed under Part B;
- public-interest disclosures, which are addressed under Part D;
- collective disputes between the College and a recognised representative body;
- appeals against decisions taken under other College procedures, which shall be considered under the appeal arrangements set out in those procedures.

### **C2. Stage 1 – Informal Resolution**

C2.1 Most concerns can and should be resolved informally and at the earliest opportunity, normally with the immediate line manager. The staff member should raise the matter clearly, explain the impact, and indicate the outcome sought.

C2.2 Line managers shall take informal concerns seriously, listen carefully, and respond in a timely and constructive manner. Resolution may include clarification, agreed change of working arrangements, or other practical steps.

C2.3 Where the grievance concerns the immediate line manager, or where the staff member considers that informal resolution with the line manager is not appropriate, the matter may be raised with the next level of management or with the Office of the Principal.

C2.4 Mediation. Where appropriate, the College may offer mediation through a trained internal or external mediator. Participation is voluntary.

### **C3. Stage 2 – Formal Grievance**

C3.1 Submission. A formal grievance shall be submitted in writing to HR or, where HR is the subject of the grievance, to the Office of the Principal. The written grievance shall set out:

- the staff member's name, role, and contact details;
- a clear statement of the grievance, including relevant dates, facts, and persons involved;
- a summary of any steps already taken to resolve the matter informally;
- the outcome or remedy sought;
- any reasonable adjustments required;
- the date of submission.

C3.2 Timescale for Submission. A formal grievance should normally be submitted within three (3) months of the matter giving rise to it, or within three (3) months of the conclusion of informal resolution. Late grievances may be accepted at the College's discretion where good reason for the delay is shown.

C3.3 Acknowledgement and Allocation. Receipt shall be acknowledged within five (5) working days. The matter shall be allocated to a Grievance Hearer with no prior involvement and no material conflict of interest, supported by HR.

C3.4 Hearing. The staff member shall be invited to a grievance hearing normally within fifteen (15) working days of receipt, with at least five (5) working days' notice, the right to be accompanied, the documentation to be considered, and any witnesses to be invited. The hearing shall be conducted fairly and without unnecessary formality.

C3.5 Investigation. Where the matter requires investigation, the Grievance Hearer may direct an investigation by HR, by another senior member of staff with no prior involvement, or by an external investigator. A written report shall be produced, the substance of which shall be shared with the staff member for response before the Grievance Hearer reaches a decision.

C3.6 Decision. The Grievance Hearer shall reach a decision, which may include upholding the grievance in whole or in part, not upholding the grievance, identifying remedies (such as changes to working arrangements, mediation, or additional training), or referring elements to another procedure. The decision shall be communicated in writing with reasons normally within ten (10) working days of the hearing, and shall explain the right of appeal.

## **C4. Stage 3 – Appeal**

C4.1 A staff member dissatisfied with the Stage 2 outcome may appeal in writing within ten (10) working days. Grounds of appeal are procedural error materially affecting the outcome, unreasonableness of the decision in light of the evidence, or new evidence that could not reasonably have been submitted at Stage 2.

C4.2 The appeal shall be heard by a senior officer with no prior involvement, at, where reasonably possible, a more senior level than the Grievance Hearer. Where the Stage 2 decision was taken by the Principal, the appeal shall be heard by the Chair of the Unibridge Group Board or designated governor.

C4.3 The appeal hearing shall normally take place within fifteen (15) working days of receipt of the appeal. The right to be accompanied applies. The Appeal Hearer may confirm, vary, or rescind the Stage 2 decision. The outcome shall be communicated in writing with reasons normally within ten (10) working days. The outcome of the appeal represents the final stage of internal procedure.

## **C5. Specific Provisions**

C5.1 Grievances Against Senior Officers. Grievances against a member of the senior leadership team shall be allocated to the Principal or to another senior officer of equivalent or greater seniority who is not the subject. Grievances against the Principal shall be allocated to the Chair of the Unibridge Group Board. Grievances against the Chair of the Unibridge Group Board shall be allocated to another senior governor designated by the Board.

**C5.2 Grievances Raised After Leaving Employment.** A staff member may raise a grievance in writing within three (3) months of the termination of employment in respect of a matter arising during employment. The College shall consider the matter through a modified procedure proportionate to the circumstances, normally consisting of a written exchange leading to a written outcome.

**C5.3 Group Grievances.** Two or more staff members may submit the same or substantially the same grievance jointly, handled through a single process with a nominated representative. Each retains the right to be accompanied.

**C5.4 Overlap with Disciplinary Action.** Where a grievance is raised by a staff member subject to a current disciplinary process under Part B, the College shall consider whether to suspend, run concurrently with, or sequence the two processes. The decision shall be made by HR in consultation with the relevant senior manager.

**C5.5 Vexatious or Malicious Grievances.** Grievances found to have been raised vexatiously or maliciously may be considered under Part B.

## **PART D — WHISTLEBLOWING POLICY**

### **D1. Purpose and Scope**

**D1.1** GAMTA is committed to operating with openness, accountability, and integrity. This Policy provides a confidential route for staff and others to raise genuine concerns about wrongdoing in the public interest, in accordance with the Public Interest Disclosure Act 1998 (PIDA) and the Employment Rights Act 1996, and provides protection from detriment for those who do so.

**D1.2** This Policy applies to all employees, workers, agency staff, and self-employed visiting practitioners engaged by the College. It is also available, with such adaptation as is appropriate, to contractors, governors, and (in respect of matters concerning their interaction with the College) to students, applicants, and members of the public.

**D1.3** This Policy is concerned with disclosures in the public interest. It is not a route for grievances about a person's own employment terms (which are addressed under Part C), allegations of unacceptable behaviour against an individual (which are addressed under Part A or the Harassment and Sexual Misconduct Policy), or disagreements about academic or artistic judgement.

### **D2. What May Be Disclosed**

**D2.1** Under PIDA, a disclosure qualifies for protection where the worker reasonably believes that the disclosure is made in the public interest and tends to show one or more of the following:

- a criminal offence has been committed, is being committed, or is likely to be committed;
- a person has failed, is failing, or is likely to fail to comply with any legal obligation;
- a miscarriage of justice has occurred, is occurring, or is likely to occur;
- the health or safety of any individual has been, is being, or is likely to be endangered;
- the environment has been, is being, or is likely to be damaged;
- information tending to show any of the above has been, is being, or is likely to be deliberately concealed.

**D2.2** In the context of the College, relevant concerns may include, by way of illustration, fraud or financial irregularity; bribery, corruption, or breach of the Bribery Act 2010; misuse of public, validating-partner, awarding-body, or sponsor funds; modern slavery or human trafficking concerns under the Modern Slavery Act 2015; serious breach of safeguarding requirements; serious health and safety failings in studios, rehearsal, technical, or production environments; serious breach of data protection requirements; serious academic integrity failings affecting the

College's qualifications or those of the validating partner or awarding bodies; serious breach of UKVI sponsorship obligations; or the deliberate concealment of any of these matters.

### **D3. Protection from Detriment**

D3.1 A worker who makes a qualifying disclosure under this Policy shall not be subjected to detriment by the College or by any colleague on the ground of having made the disclosure. Detriment includes dismissal, demotion, exclusion, withdrawal of opportunities, harassment, or other adverse treatment connected to the disclosure.

D3.2 A worker who believes they have been subjected to detriment for making a qualifying disclosure may raise the matter under Part C (Grievance Procedure) and may, where applicable, pursue their statutory rights under PIDA and the Employment Rights Act 1996.

D3.3 False or malicious allegations made in bad faith are not protected and may be considered under Part B (Disciplinary Procedure).

### **D4. How to Raise a Concern**

D4.1 Internal Routes. A concern under this Policy should normally be raised internally, in writing where reasonably possible, with one of the following:

- the worker's line manager (where appropriate to the nature of the concern and not the subject of it);
- the Director of Human Resources (or designated HR Lead);
- the College Principal;
- the Chair of the Unibridge Group Board, where the concern relates to the College Principal or to the senior leadership;
- the Chair of the Audit and Risk Committee or designated Safeguarding Governor, depending on the nature of the concern.

D4.2 Contents of a Disclosure. A disclosure should normally include the nature of the concern, the basis for the worker's belief, dates and locations as relevant, the persons involved, and any documentary or other evidence available. Concerns raised anonymously may be considered but are inherently more difficult to investigate; anonymous concerns of serious public interest shall be considered on their merits.

D4.3 Acknowledgement and Initial Assessment. Receipt of a disclosure shall be acknowledged within five (5) working days. An initial assessment shall be undertaken, normally by the recipient and HR or, where appropriate, by a senior officer outside the management chain of the concern.

D4.4 Investigation. Where the initial assessment indicates that the concern warrants further consideration, an investigation shall be undertaken. The Investigator shall have no material conflict of interest. The College may engage an external investigator in complex cases. The Investigator shall produce a written report.

D4.5 Outcome. The outcome shall be communicated to the discloser in writing so far as is consistent with confidentiality, legal restrictions, and the rights of any individuals identified in the concern. The College shall identify any actions to be taken, which may include disciplinary action under Part B, referral to statutory partners (including Police Scotland, the Information Commissioner's Office, the Health and Safety Executive, Disclosure Scotland, the validating partner, the relevant Scottish awarding body, or UKVI), or operational changes.

### **D5. External Routes**

D5.1 External Routes Where Internal Disclosure Is Not Appropriate. Where the worker reasonably believes that an internal disclosure would not be appropriate (for example, because the matter concerns the most senior leadership, because the worker fears detriment, or because

the matter is exceptionally serious), the worker may make a protected disclosure to a “prescribed person” listed in the Public Interest Disclosure (Prescribed Persons) Order 2014, including:

- the Information Commissioner’s Office (data protection matters);
- the Health and Safety Executive (workplace health and safety matters);
- Police Scotland (criminal matters);
- the Charity Commission for England and Wales or the Office of the Scottish Charity Regulator (charity matters, where applicable);
- the Scottish Public Services Ombudsman (where applicable);
- HM Revenue and Customs (tax matters);
- Disclosure Scotland (PVG matters);
- the validating partner or relevant Scottish awarding body (matters within their remit);
- UK Visas and Immigration (UKVI sponsorship matters).

D5.2 Workers considering external disclosure are encouraged to seek confidential, independent advice from Protect (the whistleblowing charity) or from a trade union before doing so.

## **D6. Confidentiality and Records**

D6.1 The College shall handle disclosures in confidence so far as reasonably possible, sharing information only on a need-to-know basis. The identity of the discloser shall not be disclosed without their consent, save where disclosure is required by law, by court order, or where disclosure is necessary to investigate and act on the concern and the discloser has been so informed.

D6.2 Records of disclosures, assessments, investigations, and outcomes shall be retained securely in accordance with the Privacy and Information Security Policy.

D6.3 An anonymised summary of disclosures received and outcomes shall be reported annually to the Audit and Risk Committee or equivalent body of the Unibridge Group Board.

## **Closing Provisions**

X.1 Records. Records arising under any Part of this Manual shall be processed in accordance with the UK GDPR, the Data Protection Act 2018, and the Privacy and Information Security Policy. The standard retention period for matters concluded under Parts A, B, C, and D is six (6) years from the conclusion of the matter, save where a longer period applies under safeguarding arrangements or as required by law.

X.2 Equality and Reasonable Adjustments. All Parts of this Manual operate in accordance with the Equality, Diversity and Inclusion Policy and the Equality Act 2010. Reasonable adjustments shall be considered throughout.

X.3 Monitoring. Anonymised data on the operation of this Manual shall be reported periodically to the College Principal and to the Unibridge Group Board, with equality monitoring, to inform continuous improvement.

X.4 Review. This Manual shall be reviewed periodically, and in any event at least every three (3) years, or earlier where required by legislative, regulatory, or operational changes, in consultation with staff and any recognised representative bodies. Material changes shall require approval by the Unibridge Group Board.

X.5 Interpretation. Where this Manual is silent on a matter, the relevant standalone College policy, the Acas Code of Practice, and applicable employment law shall prevail. Where any apparent inconsistency arises between this Manual and a standalone policy applying to the wider College community (including the Harassment and Sexual Misconduct Policy, the Equality,

Diversity and Inclusion Policy, the Privacy and Information Security Policy, or the Safeguarding Policy), the standalone policy shall prevail in relation to matters within its scope and the Manual shall be updated to align.

**END OF MANUAL**