

Hostlink UK Whistleblowing Policy

1. Purpose

Hostlink UK is committed to maintaining the highest standards of integrity, professionalism, openness and accountability in all aspects of its work. We encourage all staff, homestay hosts, group leaders, contractors, volunteers and others working with or on behalf of Hostlink UK to report any genuine concerns about malpractice, wrongdoing or risks to the welfare of students, staff or the organisation.

No individual should feel unable to raise concerns because they fear victimisation, discrimination or adverse treatment. Hostlink UK will ensure that concerns raised in good faith are taken seriously, investigated appropriately and handled confidentially wherever possible.

This policy should be read alongside the Hostlink UK Safeguarding Policy, Student Welfare Policy, Complaints Procedure, Code of Conduct and Disciplinary Policy.

2. Scope

This policy applies to:

- employees;
- agency staff and contractors;
- homestay hosts;
- volunteers;
- group leaders;
- consultants;
- anyone working on behalf of Hostlink UK.

Students are encouraged to report concerns through the Student Complaints Procedure or directly to a member of staff responsible for student welfare or safeguarding.

3. What Should Be Reported?

Concerns that may be raised under this policy include, but are not limited to:

- safeguarding concerns involving children or vulnerable adults;
- abuse, neglect or exploitation;
- behaviour that places students or staff at risk;
- criminal offences or suspected criminal activity;
- fraud, theft or financial malpractice;
- breaches of legal or regulatory requirements;
- discrimination, harassment or bullying;
- health and safety risks;
- environmental damage;
- serious breaches of Hostlink UK's policies or procedures;
- deliberate concealment of any of the above.

Concerns relating solely to an individual's own employment should normally be raised through the Grievance Procedure.

4. Legal Protection

Hostlink UK recognises the legal protection provided under the Public Interest Disclosure Act 1998.

Any individual who raises a concern in good faith and with a reasonable belief that wrongdoing has occurred, is occurring or is likely to occur will not suffer dismissal, disciplinary action, victimisation or any other detrimental treatment because they have made a protected disclosure.

Making a disclosure that later proves to be unfounded will not result in disciplinary action provided the concern was raised honestly and in good faith.

However, deliberately false, malicious or vexatious allegations may result in disciplinary or other appropriate action.

5. Confidentiality

Hostlink UK will treat all whistleblowing concerns as confidential wherever possible.

The identity of the individual making the disclosure will only be shared where:

- they have given consent;
- disclosure is required by law;
- it is necessary to protect the safety or welfare of another person;
- it is necessary to conduct a fair investigation.

Where confidentiality cannot be maintained, the individual will normally be informed before their identity is disclosed, unless doing so would place someone at risk or prejudice an investigation.

6. Anonymous Disclosures

Anonymous disclosures will be considered where sufficient information is provided to investigate the concern.

However, anonymous reports may be more difficult to investigate or resolve, and individuals are encouraged to identify themselves wherever possible.

The decision to investigate an anonymous concern will depend upon:

- the seriousness of the allegation;
 - the credibility of the information;
 - whether sufficient evidence exists to support an investigation.
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7. How to Raise a Concern

Concerns should be reported as soon as reasonably possible.

Reports may be made to:

- the Business Owner;
- the Designated Safeguarding Lead (DSL), where the concern relates to safeguarding;
- a Senior Manager;
- another appropriate senior member of staff if the concern involves line management.

If the concern involves the Business Owner, it should be reported directly to the nominated Senior Manager, Designated Safeguarding Lead or an independent external adviser appointed by Hostlink UK.

Where there is an immediate risk to a student or another individual, emergency services and/or the relevant safeguarding authority should be contacted without delay.

Where criminal activity is suspected, Hostlink UK will cooperate fully with the police and other statutory agencies.

8. Safeguarding Concerns

Any concern relating to the safety or welfare of a child or vulnerable adult must be reported immediately to the Designated Safeguarding Lead.

Safeguarding concerns will always take priority and will be managed in accordance with the Hostlink UK Safeguarding Policy.

Where necessary, referrals will be made promptly to Children's Social Care, the Police, the Local Authority Designated Officer (LADO), or other appropriate safeguarding agencies.

9. Investigation Process

All concerns will be acknowledged promptly where contact details are available.

The appointed investigating officer will:

- assess the nature and seriousness of the concern;
- obtain all relevant information and evidence;
- determine whether immediate safeguarding or protective action is required;
- conduct an impartial investigation;
- seek specialist advice where appropriate;
- maintain accurate and confidential records throughout the investigation;
- make recommendations for appropriate action.

Individuals who are the subject of an allegation will normally be informed of the concern unless doing so would:

- place another person at risk;
- compromise safeguarding arrangements;
- prejudice a criminal investigation.

Following the investigation, appropriate action may include:

- no further action;
 - changes to policies or procedures;
 - additional training;
 - disciplinary action;
 - referral to external authorities or regulatory bodies.
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10. Timescales

Hostlink UK will investigate concerns as promptly as possible.

The timescale will depend upon the complexity of the matter and whether external agencies are involved.

Where appropriate, the individual raising the concern will receive updates on the progress of the investigation, although information may be limited to protect confidentiality or legal proceedings.

11. Protection from Victimisation

Hostlink UK will not tolerate retaliation against anyone who raises a genuine concern.

Any employee, contractor, homestay host or volunteer who victimises or retaliates against another individual for making a protected disclosure may be subject to disciplinary action.

12. Record Keeping

All whistleblowing reports and investigations will be recorded securely.

Records will be retained in accordance with Hostlink UK's Data Protection Policy and applicable legal requirements.

13. External Reporting

Where an individual reasonably believes that concerns have not been appropriately addressed internally, they may make a protected disclosure to a prescribed external body in accordance with the Public Interest Disclosure Act.

Depending on the nature of the concern, this may include:

- the Health and Safety Executive (HSE);
- the Disclosure and Barring Service (DBS);
- Ofsted (where relevant);
- the Police;
- the Local Authority;
- other prescribed regulators listed by the UK Government.

Nothing in this policy prevents an individual from making a protected disclosure to an appropriate prescribed body where permitted by law.

14. Policy Review

This policy will be reviewed annually, following any significant legislative or regulatory changes, or after any serious incident, to ensure it remains effective and compliant with current UK legislation and British Council Accreditation UK requirements.

Last updated July 2026

Next review July 2027