

## WHISTLEBLOWING POLICY

### Introduction

The aim of this policy is to encourage employees, contractors and anyone else eligible to raise genuine concerns they might have about certain wrongdoings within the company without fear of reprisal; to provide guidance on how to raise those concerns and to enable the company to investigate such concerns and deal with them appropriately.

### Eligibility

This policy applies to all employees, apprentices, contractors and anyone else who has a contract to carry out work for the company personally.

### Scope

Those eligible (as listed above) should not use this policy for complaints relating to their own circumstances, such as the way they have been treated at work. In those cases, the Grievance policy, or the Anti-bullying and Harassment policy should be used as appropriate. This policy is for making a disclosure of wrongdoing or malpractice if it is reasonably thought that disclosure is in the public interest. If anyone is uncertain whether or not something is within scope of this policy they should seek advice from a member of the Senior Management Team.

### Types of wrongdoing addresses by this policy

If anyone genuinely believes that the Company, or any of its workers, has taken, or is intending to take or has failed to take action that they reasonably believe could lead to:

- A criminal offence including bribery
- A failure to comply with any Ofqual obligations
- A failure to comply with any legal obligations
- A miscarriage of justice
- Danger to the health and safety of any individual
- Damage to the environment, or
- The deliberate concealment of information concerning any of the matters listed above

They should disclose this information verbally or in writing to their Line Manager or a member of the Senior Management Team. Anyone making such a disclosure should provide full details and, where possible, supporting evidence.

Any concerns covered by this policy should be raised with the Managing Director (unless concerns relate to the Managing Director in which case they should be raised with the Chairman) to allow the company chance to deal with them. This procedure should not be bypassed and any concerns should not be aired externally, other than in exceptional circumstances, for example if there is good reason to believe that evidence would be destroyed. Remember also that social media sites such as YouTube and Facebook are public rather than private spaces, and they are not the appropriate channel for raising concerns.

### **Investigating Allegations of Wrongdoing**

If anyone discloses information in accordance with this policy, wherever reasonably practicable, the company will keep that person's identity confidential.

The Managing Director (or Chairman) will investigate allegations promptly. During the course of the investigation, the company may require the assistance of the person making the disclosure. The company discourages anonymous disclosures as they are likely to hinder effective investigation.

The company will aim to keep the person making the disclosure informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent the company giving them specific details of the investigation or any disciplinary action taken as a result. The person making the disclosure should treat information about the investigation as confidential.

Whilst the company cannot always guarantee the outcome the discloser is seeking, the company will try to deal with any concerns fairly and in an appropriate way; by using this policy you can help the company achieve this.

The company will inform the person making the disclosure of the outcome of the investigation as soon as practicable. The company will take whatever action they consider to be appropriate.

### **Action the Company may take**

No action will be taken against anyone who raises a genuine concern in accordance with this policy.

The company make take appropriate action against any person found to be:

- Victimising another person for using this policy. If anyone thinks they have been victimised contact a member of the Senior Management Team, or raise it formally under the Grievance procedure if the matter is not remedied.
- Deterring any person from reporting genuine concerns under this policy. If anyone thinks they have been deterred, please contact a member of the Senior Management Team, and raise it formally under the Grievance procedure if the matter is not remedied.
- Making false and/or malicious allegations.

For employees this action may involve the company taking disciplinary action, which may result in dismissal. The company may also take disciplinary action against a person who does not act in accordance with this policy.

Signed



Date: 11/10/2021

V3.1123

This policy must be reviewed no later than November 2022