



assessments

Whistleblowing Policy

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Policy Purpose and Scope

This policy applies to all Inspiring Learning employees, agency workers, external consultants and service providers.

Wrongdoing can occur and it is important that employees know what to do if, in the course of their work, they come across something that they think is fundamentally wrong, illegal or endangers others within the company or the public.

It is important to Inspiring Learning that any fraud, misconduct or wrongdoing by employees and management of the company is reported and properly dealt with. This Policy and Procedure ensure that there are effective arrangements in place so employees feel safe to speak up and will guide employees through the process of raising a concern, which is sometimes referred to as 'blowing the whistle', and how these concerns will be dealt with.

This policy does not cover personal grievances including complaints about employment matters, which will be covered under the Anti-Bullying and Harassment Policy and ER guidance. These documents can be found in the HR library on Flow.

Definition

Whistleblowing is the term used when an employee passes on information about wrongdoing. Generally, these concerns are resolved through provision of information and informal discussions with a direct manager. When an individual feels that the informal route is not appropriate, they can make a formal disclosure.

If an employee is concerned that any of the things below are happening, have happened or are likely to happen, Inspiring Learning encourages them to raise this as soon as possible:

- A risk to a child due to the staff conduct
- Any bribery, fraud, or other criminal offence
- A miscarriage of justice
- A risk to health and safety
- A risk or actual damage to the environment
- A breach of any other legal or professional obligation.
- A concealment of any of the above

Inspiring Learning particularly want employees to report if they have any concerns that modern slavery is taking place within the organisation, the suppliers, and agencies we work with, or within our local communities so that these matters can be investigated by the proper authorities.

Inspiring Learning operates an open-door policy and encourages all employees to raise any concerns.

Whistleblowing Procedure

Whistleblowing is when an employee reports suspected past, present, or imminent wrongdoing, or an attempt to conceal wrongdoing. Officially this is called 'making a disclosure in the public interest'. It serves to protect and reassure the workforce, increasing public confidence and to maintain a healthy working culture and an efficient organisation.

This procedure outlines the process that employees should follow when reporting a perceived wrongdoing within Inspiring Learning, including something they believe goes against our core values.

It is important that this procedure is followed when raising any concerns, to ensure that the matter is dealt with correctly. Where a concern is raised using the correct procedure, the individual will be protected from any unfair or negative treatment. As set out in this procedure, employees can raise concerns through a number of internal routes.

Raising a Concern

Inspiring Learning wishes to encourage all employees and other workers who have concerns about wrongdoing or malpractice involving any aspect of the company's work, to feel able to come forward and voice these without fear and in confidence. It is important that concerns are raised at the earliest time possible as this will allow the opportunity to address and resolve any concerns quickly. Employees will be able to use this procedure to alert the appropriate people about such issues.

Initial concerns should be raised with direct management if appropriate or the HR team if the concern would not be suitable to be raised with direct management. It is not necessary for the employee raising the concern to have proof that such an act is being, has been, or is likely to be, committed. The employee must, however, have a reasonable belief that disclosing the information is in the public interest before raising a concern using the procedure set out in this policy. If it is found that an employee has knowingly made a false allegation, we may deal with this under the Disciplinary procedure.

Upon reaching a decision to carry out a formal disclosure, employees and associated persons should be reminded of their duty of confidentiality to both Inspiring Learning and its customers/partners.

All formal concerns must be raised in writing (in a letter or in an email) to HR. hrsharedservices@inspiring-learning.com

The employee raising the disclosure has no responsibility for investigating the matter, it is the company's responsibility to ensure that an investigation takes place. A confidential meeting between HR and the individual raising the disclosure is likely to take place to help with the investigation.

All concerns will be investigated and dealt with as appropriate by HR and senior management/ directors if necessary. The employee who raised the concern or issue

will be informed of the outcome of the investigations and what, if any, action has been taken.

If an employee feels their concern is not being dealt with in line with this policy they can contact the local authority as a next step, or the police if it could be a criminal matter. Camp Beaumont employees can also make a report to Ofsted.

Reporting by Non-Employees

Whilst the majority of disclosures will be made by employees, there is scope within the legislation for non-employees and those associated with Inspiring Learning to raise whistleblowing concerns. This may include customers, partners, or guests. Members of the public may also feel they wish to pursue a matter they feel is in the public interest. In this case the procedure will not differ from that of an employee.

Protection

Individuals may be anxious that, by reporting genuine whistleblowing concerns their actions may leave them vulnerable. It is important to emphasise that Inspiring Learning 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 reporting of wrongdoing under this procedure will be covered by the law concerning protected disclosures of information. The procedure has therefore been written with reference to the Public Interest Disclosure Act 1998 (PIDA), which offers protection to those in both the private and public sectors, who speak up or raise a concern, in certain circumstances.

Support

Inspiring Learning appreciates that this might be a difficult time for employees who may feel uncertain about how to progress a concern. Support is available at all stages of the process from the HR team and our Safeguarding Lead. Our Employee Assistance Programme and a wealth of wellness information including webinars, workout videos and advice can also be accessed through Perkbox, our Employee Benefits and Reward portal.

The following principles underpin this policy:

- Employees are encouraged to speak up and raise any concerns they may have about wrongdoing as soon as they notice it
- Employees raising a concern will be afforded protection as detailed in the Procedure
- Employees raising a concern will be listened to and treated with respect
- All concerns will be handled responsibly, professionally and in a positive manner

- Help and support will be provided to employees where concerns are raised under this policy
- Managers will be supported in dealing appropriately with concerns which are raised with them.