



## Whistle Blowing Policy

Updated: December 2015

Next revision date: December 2016

### 1. Objectives

- 1.1 To enable individuals formally to highlight issues of concern or malpractices in the workplace without fear of victimization or retribution and appropriate action taken.

### 2. Scope

- 2.1 To cover all activities carried out by Develop

### 3. Key Principles

- 3.1 Develop recognizes that raising issues of genuine concern about business activities malpractice may be a difficult choice for people to make. However, as a business we expect employees to be responsible for highlighting their concerns so that problems can be resolved and removed quickly and effectively. In accordance with the Public Interest Disclosure Act 1998 this policy provides people with an appropriate forum for raising such issues.
- 3.2. Because the company takes such matters very seriously, this policy provides an opportunity for staff to formally highlight issues of concern or malpractice in the workplace without fear of victimization or retribution and appropriate action taken. Genuine concerns raised under this Policy will provide people with protection under the Public Interest Disclosure Act.
- 3.3. Issues may be formally raised through an employee's immediate line manager, CEO, Director or Chair.

### 4. Examples of Issues to be Raised

- 4.1. Any person that has a reasonable suspicion and/or evidence that inappropriate activities or malpractice exists in the business, either relating to people or business processes, should raise this issue internally, as a

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**matter of urgency, so that it can be dealt with quickly and effectively.**

**Issues may relate to :-**

- **Contravention of Company Policies of Codes of Practice**
- **Criminal offences**
- **Failure to comply with legal obligations**
- **Miscarriages of justice**
- **Health and Safety**
- **Damage to the environment**
- **Actions to deliberately conceal evidence of any of the above categories**

**4.2. A formal issue may be raised either when the matter has occurred, is occurring or is felt likely to occur.**

**4.3. Issues can be raised through one of the following people, as appropriate:-**

- **Line Manager**
- **CEO**
- **Director**
- **Chairman**

**4.4. Details will be taken about the concern raised, people involved any actions already undertaken and views on the potential solution to the problem. A full investigation will be undertaken either by the person receiving the complaint or a more appropriate nominated person. If you raise an issue you will be encouraged to participate fully in any investigation. Every effort will be made to provide specific and timely feedback, in writing about the progress of the investigation, however, this may not always be possible, as to do so may break our responsibility of confidence to another party involved in the investigation.**

## **5. Confidentiality**

**5.1 Whilst it will be very difficult to deal with any compliments raised on an anonymous basis, Develop recognizes that people may want to raise a concern in confidence, under this policy. Any person may ask the company to protect their identity by keeping their confidence and Develop will commit to do so, although it may ask for a good reason for concealing your identity. Develop will endeavor to maintain this confidentially even where formal requests for full information are received, in the course of legal proceedings.**

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## 6. Staff Protection

- 6.1. If a genuine concern is raised under this policy, Develop will ensure that the member of staff raising the concern will not be at risk of losing his/her job or suffer any form of disadvantage in the working environment as a result. This assurance is not extended to someone who maliciously raises a matter that they know to be untrue. In the event of this happening the individual could be liable to disciplinary action.

## 7. Staff responsibility

### 7.1 All staff

- 7.2 CEO has overall and final responsibility for all matters relating to whistle blowing.

- 7.3 The day-to-day responsibility for the Whistle Blowing Policy remains with the CEO, who will ensure that :-

- i. Adequate resources are made available to implement this policy
- ii. Adequate arrangements are made to bring this policy to the notice of all staff, learners, learning providers and visitors
- iii. The effectiveness of the policy and its arrangements are reviewed annually during the relevant Strategy Group meeting or more frequently if deemed necessary.

## 8. Monitoring and Evaluation

- 8.1 Through the monthly manager's meeting.

- 8.2 This policy is liable to full equality impact assessment annually

## 9. Supporting Documents

- 9.1 This policy should be read in conjunction with all the company personnel manual.

Policy signed by

*Mark Pike*

CEO: Date: 01/12/2015

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