

## WHISTLEBLOWING POLICY

### Introduction

This policy sets out how an individual can make a disclosure under the Public Interest Disclosure Act 1998. The policy applies to all employees, and associates of Wessex Training and Assessment Ltd, additionally any other individuals performing functions in relation to the organisation, such as agency workers and contractors, are free to use it.

It is important to the organisation that any fraud, misconduct or wrongdoing by workers or individuals connected with the company is reported so it can then be properly dealt with. Consequently, Wessex encourages all individuals to raise any concerns that they may have about the conduct of those in the business or the way in which the business is run. This policy sets out the ways in which an individual may raise any concerns that they have and how those concerns will be dealt with.

### Background

The law provides protection for workers who raise legitimate concerns about specified matters. These are called "qualifying disclosures". A qualifying disclosure is one made in the public interest by a worker who has a reasonable belief that:

- a criminal offence.
- a miscarriage of justice.
- an act creating risk to health, safety, and welfare.
- a safeguarding risk. (see Appendix 1)

### Principles

All staff need to be aware of the importance of preventing and eliminating wrongdoing at work. They should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.

Any matter raised under this procedure will be investigated thoroughly, promptly, and confidentially, and the outcome of the investigation reported back to the individual who raised the issue.

Nobody will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the whistleblowing individual will not be prejudiced because he/she has raised a legitimate

concern. Victimisation of a staff member for raising a qualified disclosure will be a disciplinary offence.

If misconduct is discovered because of any investigation under this procedure the company's disciplinary procedure will be used, in addition to any appropriate external measures. Maliciously making a false allegation is a disciplinary offence.

Any instruction to cover up wrongdoing is in itself a disciplinary offence. If anyone is told not to raise or pursue any concern, even by a person in authority such as a manager, they should not remain silent and should take the matter higher to a director if need be.

This procedure is for disclosures about matters other than a breach of an employee's own contract of employment. If an individual is concerned that their own contract has been, or is likely to be, broken, they should raise their concerns through the company's grievance procedure.

## Procedure

### *Stage 1*

In the first instance, and unless one reasonably believes that one's line manager is involved in the wrongdoing, or if for any other reason one does not wish to approach one's line manager, any concerns should be raised with them line. If one does believe your line manager to be complicit, or for any reason do not wish to approach them, then one should proceed straight to stage 3.

### *Stage 2*

The line manager will arrange an investigation into the matter (either by investigating the matter him/herself or immediately passing the issue to someone in a more senior position or to our HR consultancy provider). The investigation may necessitate the whistle-blower and other individuals involved giving a written statement. Any investigation will be carried out in accordance with the principles set out above. One's statement will be considered, and one will be asked to comment on any additional evidence obtained. The line manager (or the person who carried out the investigation) will then report to a director, and they will take any necessary action, including reporting the matter to any appropriate government department or regulatory agency. If disciplinary action is required, the line manager (or the person who carried out the investigation) will report the matter to our HR consultancy provider and start the disciplinary procedure. On conclusion of any investigation, one will be told the outcome of the investigation and what the director has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained.

### *Stage 3*

If the whistle blower is concerned that their line manager is involved in the wrongdoing, has failed to make a proper investigation, or has failed to report the outcome of the investigations to a director, they should inform a director of the company, who will arrange

for another manager to review the investigation carried out, make any necessary enquiries, and make their own report as in stage 2 above. If for any other reason one does not wish to approach one's line manager, one should also in the first instance contact a director. Any approach to a director will be treated with the strictest confidence and one's identity will not be disclosed without prior consent.

#### Stage 4

If on conclusion of stages 1, 2 and 3 one reasonably believes that the appropriate action has not been taken, one should report the matter to the proper authority. The legislation sets out several bodies to which qualifying disclosures may be made. These include:

- HM Revenue & Customs.
- The Financial Conduct Authority (formerly the Financial Services Authority).
- The Competition and Markets Authority.
- The Health and Safety Executive.
- The Environment Agency.
- The Independent Police Complaints Commission; and
- The Serious Fraud Office.
- The Skills Funding Agency

#### Review of Policy

This policy will be reviewed annually.

Date	Name	Record of change	Next Review Date
30-06-2023	Lynn Croucher		30-06-2023
30-06-2024	Lynn Croucher		30-06-2025

#### Appendix 1 Safeguarding Concerns

If staff have safeguarding concerns or an allegation is made about another member of staff or associate (including supply staff, volunteers, and contractors) posing a risk of harm to children/young persons, then:

- this should be referred to the CEO - Andrea Serlin 07708247603  
andreaserlinweyt@gmail.com