



## Whistleblowing Policy

Whistleblowing Policy	Version: 1.0	Page 1 of 5
Created: 27.05.2021	Review Date: 31.05.2022	
Owner: Quality and Compliance Officer	Location: Z:\WREC\WREC Documents\Policies and Procedures	

## 1. Introduction

1.1. Whitehead-Ross Education and Consulting conducts its business at all times with the highest standards of integrity and honesty. It expects all its employees to maintain the same standards in everything they do. It is important to WREC that any fraud, misconduct or wrongdoing by employees of the organisation is reported and properly dealt with. WREC therefore encourages all individuals to raise any concerns that they may have about the conduct of others in the business or the way in which the business is run. This policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with.

## 2. Aim

2.1. The aim of this policy is to:

- enable and encourage employees to raise genuine concerns about possible wrongdoing at work without fear of reprisal and to reassure workers that such matters will be dealt with seriously and effectively by WREC internally, and
- allow WREC to take action against any employee who makes allegations in bad faith and/or publicly discloses information when it is unreasonable for them to do so in line with the WREC Disciplinary & Grievance Policy and Procedure.

2.2. It is particularly important to state that this policy is separate from WREC's Disciplinary & Grievance Policy and Procedure, which relates to general concerns which an employee may have about their own personal circumstances. This Whistleblowing Policy is designed to ensure that concerns about possible illegal or dangerous activities or forms of malpractice are brought swiftly to management's attention. These may not necessarily be related to the whistle-blower's area of work.

## 3. Application

3.1. This policy applies to all employees, permanent or temporary, at WREC.

## 4. The Public Interest Disclosure Act 1998

4.1. The Public Interest Disclosure Act 1998 amended the Employment Rights Act 1996 is to provide protection for employees who raise legitimate concerns about specified matters. These are called "qualifying disclosures". A qualifying disclosure is one made in good faith by an employee who has a reasonable belief that:

- a criminal offence (including fraudulent and corrupt behaviour, e.g., theft, fraud or malpractice);
- a miscarriage of justice,
- an act creating risk to health and safety,
- an act causing damage to the environment,
- a breach of any other legal obligation, or
- concealment of any of the above,
- is being, has been, or is likely to be, committed.

Whistleblowing Policy	Version: 1.0	Page 2 of 5
Created: 27.05.2021	Review Date: 31.05.2022	
Owner: Quality and Compliance Officer	Location: Z:\WREC\WREC Documents\Policies and Procedures	

- 4.2. It is not necessary for the employee to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. The employee has no responsibility for investigating the matter - it is the organisation's responsibility to ensure that an investigation takes place.
- 4.3. An employee who makes such a protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimised, because he/she has made a disclosure.
- 4.4. WREC encourages employees to raise their concerns under this procedure in the first instance. If an employee is not sure whether or not to raise a concern, he/she should discuss the issue with his/her line manager or the Managing Director.

## 5. Procedure

### 5.1. Who to disclose to:

5.1.1. In most cases, an employee should raise any concerns they may have internally within WREC. Any matters not covered by the Act or, therefore, this policy, will be dealt with by using WREC's Disciplinary & Grievance Policy and Procedure or Bullying and Harassment Policy (as appropriate).

5.1.2. If appropriate, an employee should discuss his/her concerns with his/her line manager. An informal approach to the line manager will be treated in the strictest confidence. It will not result in a report to anyone within WREC without the employee's agreement, except where the line manager believes that the issues raised are so serious that further action may be required. Where this is the case, the line manager will refer it to the Managing Director.

5.1.3. If an employee feels it is inappropriate to raise his/her concerns with his/her line manager in the first instance (for example, if their concerns are about their line manager's actions or if they are so serious that they should be escalated to someone at a more senior level within WREC), then he/she should speak to the Managing Director in the first instance instead. All such approaches will be treated in the strictest confidence.

5.1.4. An employee must not approach individuals involved in his/her disclosure directly (whether to "tip them off" or otherwise) or attempt to investigate the matter personally.

5.1.5. WREC would urge employees to exhaust the internal processes set out above but, in exceptional or urgent circumstances, it might be appropriate for them to contact an external person or body. Legislation sets out a number of bodies to which qualifying disclosures may be made. These include:

- HM Revenue & Customs,
- the Financial Services Authority,
- the Office of Fair Trading,
- the Health and Safety Executive, and
- the Environment Agency / Natural Resources Wales

5.1.6. Disclosures to the press will not be considered reasonable. They will constitute misconduct and will be treated as a disciplinary matter in accordance with WREC's Disciplinary & Grievance Policy and Procedure.

Whistleblowing Policy	Version: 1.0	Page 3 of 5
Created: 27.05.2021	Review Date: 31.05.2022	
Owner: Quality and Compliance Officer	Location: Z:\WREC\WREC Documents\Policies and Procedures	

5.1.7.If, at any stage in the procedures, employees are unsure about what to do and would like independent advice, they might like to discuss their concerns with someone at Public Concern at Work. This body is an independent Charity staffed by lawyers, which offers confidential free legal and practical advice on how people can raise concerns about malpractice at work. They can also give advice on who else the worker may contact about what legal protection may be available. Public Concern at Work may be contacted at: [www.pcaw.co.uk](http://www.pcaw.co.uk) or by phone on 020 7404 6609.

5.1.8. Professional Associations and Trade Unions can also offer advice to members considering raising concerns.

## 5.2. Dealing with disclosures:

5.2.1.If an employee reports a disclosure to WREC, the need for confidentiality will be respected wherever possible, although any concern raised under this procedure will need to be properly documented.

5.2.2.WREC believes that all employees should feel able to put their name to the allegations which they raise, as concerns expressed anonymously are more difficult to investigate. If employees raise a concern anonymously, depending upon the exact circumstances, it may nonetheless be possible for their identity to be deduced. If, contrary to this policy, they then suffer reprisals, it may be difficult to show that this was as a result of them raising a concern, i.e. it may not be possible to protect unidentified people

5.2.3.The action taken in response to a disclosure will depend on the nature of the concern. By way of example, the matters raised may result in one or more of the following:

- No action required.
- Action being taken under other WREC policies and/or procedures.
- An internal investigation under this policy.
- A referral to the police.
- A referral to WREC's external auditors.
- An independent enquiry.

5.2.4.The responsible person to whom the disclosure is made will:

- Make a detailed record of the disclosure.
- Ask the employee to provide a written statement describing the precise nature of the allegations.
- Upon receipt of the written statement, decide whether any further action may be required. Where it is, they will refer it to the appropriate person and write to the employee within five working days of making that decision. In their letter, they will acknowledge receipt of the complaint, provide information on who it has been referred to and details of who the employee should contact if they have any further questions.

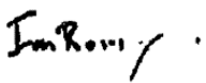
5.3. Where further action is required under this policy in relation to an employee's complaint, this will typically, in the first instance, take the form of an internal investigation. The internal investigator will be a manager or the Managing Director (as appropriate on a case by case basis). However, WREC may instead decide to arrange for a suitably qualified independent professional to undertake the investigation.

5.4. During the investigation, the employee who reported the disclosure may need to be called upon for interview. They will also be given appropriate updates of progress made during the investigation, whilst bearing in mind the need to respect the confidentiality of other workers as well.

Whistleblowing Policy	Version: 1.0	Page 4 of 5
Created: 27.05.2021	Review Date: 31.05.2022	
Owner: Quality and Compliance Officer	Location: Z:\WREC\WREC Documents\Policies and Procedures	

- 5.5. Once the investigation is complete:
- The employee will be given a prompt and thorough explanation about the result of the investigation and any action WREC is likely to take as a result of it.
  - As any allegation under this policy should be reviewed by the Executive Team.
  - Any action which the investigator decides is required will be taken.
- 5.6. WREC recognises that there may be matters which cannot be dealt with internally and external authorities may need to become involved, including the police. Where this is necessary, WREC reserves the right to make such a referral without the reporting employee's consent.
- 5.7. Any employee who has a genuine reason for their disclosure should feel confident in bringing forward their concerns.
- 5.8. WREC will not tolerate any employee being subjected to a detriment as a result of their making a disclosure in good faith. In the event that any employee believes that they have been subject to a detriment by anyone within WREC for this reason, they must inform the Managing Director immediately and appropriate action will be taken to protect them from any reprisals.
- 5.9. If anyone should try to discourage an employee from coming forward to express a genuine concern, WREC will treat this as a disciplinary matter. In the same way, the organisation will deal severely with anyone who criticises or victimises an employee or otherwise subjects them to a detriment for raising a concern.
- 5.10. However, if it should become clear that the procedure under this policy has not been invoked in good faith (for example, falsely or for malicious reasons or to pursue a personal grudge against another employee), this will constitute misconduct and it will be treated as a disciplinary matter in accordance with WREC's Disciplinary & Grievance Policy and Procedure.
- 5.11. Any employee who, in good faith, makes allegations that turn out to be unfounded will not be penalised for being genuinely mistaken.

Signed:



Ian Ross  
Managing Director

**Date: 13<sup>th</sup> May 2022**

Whistleblowing Policy	Version: 1.0	Page 5 of 5
Created: 27.05.2021	Review Date: 31.05.2022	
Owner: Quality and Compliance Officer	Location: Z:\WREC\WREC Documents\Policies and Procedures	