



Whistleblowing Policy

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Purpose

Whistle blowing is where an employee raises concerns about underhand or illegal practices within the company. Instep UK's Whistleblowing policy is to operate within the UK's laws and regulations, and all employees are expected to co-operate in this by adhering to all laws, regulations, policies and procedures.

Instep UK is committed to maintaining an open culture with the highest standards of honesty and accountability, where employees can report any legitimate concerns in confidence. Instep UK takes all malpractice very seriously, and this document sets out the procedure by which employees can report any concerns.

Instep UK offers protection to any employee who honestly and reasonably believes that underhand or illegal practices are taking place. The company undertakes to comply with all applicable laws relating to the prohibition of retaliation against good-faith whistle-blowers in line with the Public Interest Disclosure Act 1998 which gives protection to individuals, casual workers, agency workers and subcontractors who make a qualifying disclosure when they reasonably believe it is in the public interest for them to do so.

Assuming the requirements of this policy have been met, Instep UK undertakes to protect the employee from any personal claims and from any victimisation, harassment or bullying occasioned as a result of his or her disclosure. Instep UK also undertakes not to initiate any disciplinary action. The aim is that the career of any employee should not in any way be harmed or hindered as a result of his or her disclosure (whether the item reported proves to be true or not, provided the reporting was carried out in good faith).

The following policies demonstrate and support Instep UK's shared commitment to the highest standards of integrity and honesty and in Safeguarding and promoting the welfare of its stakeholders:

Bullying and Harassment	Code of Conduct
Data and Information Security	Complaints procedure
Health & Safety	Equality & Diversity & Inclusion
Safeguarding and Prevent Duty	Disciplinary
Grievance	Anti-Bribery & Corruption

Principles

Any reprisal or similar action taken against a discloser because he or she has made a protected disclosure under this policy may be regarded as gross misconduct and may result in disciplinary action. An employee who makes such a protected disclosure has the right not to be dismissed, or subjected to victimisation, because he or she made the disclosure.

The Company undertakes that no employee who makes a bona fide report under this procedure will be subjected to any detriment as a result, in accordance with section 47B of the Employment Rights Act 1996. In the event that an employee believes (s)he is being subjected to a detriment by any person within the Company as a result of a decision to invoke the procedure, they must inform the HR Manager immediately and appropriate action will be taken to protect them from any reprisals.

It is recognised that any co-worker or agent of the Company who is proven to have subjected an employee, making a legitimate and honest protected disclosure, to detrimental and/or discriminatory treatment of any kind will be subject to appropriate action as set out in the Company's Disciplinary procedure, and potentially be liable under associated legislation overseeing public interest disclosure.

The Company is keen to hear of any concerns that an employee may have about wrongdoing at work and encourages all employees and subcontractors to use the procedure described below wherever possible.

An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a Manager, employees should not agree to remain silent. The Company encourages employees in this instance to report the matter to their next level of line management.

The Company recognises there may be matters that cannot be dealt with internally and external authorities need to become involved. Where this is necessary, the Company reserves the right to make such a referral without the employee's consent.

Instep UK would expect all employees to report any of the following:

- a criminal offence
- a failure to comply with a legal obligation
- abuse of position
- a miscarriage of justice
- the endangering of an individual's health and safety
- damage to the environment
- deliberate concealment of information relating to any of the above

- fraud
- financial irregularities or serious financial maladministration arising from improper conduct
- corruption, Bribery, dishonesty or blackmail
- unethical conduct
- an act causing radicalisation or extremism.

Where the nature of a disclosure is not included in the above list, it should be made by way of the company's grievance procedure and not under this whistleblowing policy.

Reporting Procedure

In the event an employee has reason to believe that underhand or illegal practices are taking place, the employee is encouraged to make his or her disclosure immediately to either his or her own manager. Instep UK encourages employees to raise concerns internally in the first instance and feel confident that it will be dealt with properly and that all reasonable steps will be taken to prevent the individual suffering from victimisation. If you don't feel able to raise or resolve a concern with your line manager, please contact someone internally who has been nominated for this purpose:

Name: Leanne Gagic	Phone: 07734 236155
Name: Jayne Kelly	Phone: 07458088432

A line manager should report it to the nominated person above, or the employee can report it to them directly. The nominated individual will then investigate the alleged offence in conjunction with another senior employee, Head of HR or Board member, as appropriate, and any other employees as appropriate. When disclosing any concerns, the employee will not be expected to have absolute proof of malpractice, but will need to be able to show the reasons for his or her concern.

It is particularly important in matters concerning the health, safety and welfare of those on our premises (whether employees, contractors or visitors) that anyone who becomes aware of a hazard (actual or potential) or dangerous occurrence is expressly required to immediately notify their line manager and/or building supervisor before making any other report (e.g. to an outside body) not least so that immediate action can be taken if necessary to deal with the hazard.

Failure to notify Instep UK when reasonably aware or certain of an occurrence included in the list of categories of disclosures above is regarded by the company as misconduct. Failure to notify internally before notifying externally without good cause is also regarded as misconduct. Only if an employee has reasonable grounds for believing that the people to whom they should

report the concern may be involved may contact be made to an outside body in the first instance.

Where requested, Instep UK will keep the identity of the discloser confidential as far as possible. However, in certain circumstances, e.g. if a criminal investigation follows, the employee may be needed as a witness. If this happens, the nominated person will inform the employee at the earliest opportunity.

If the alleged offence is substantiated, appropriate action will be taken. The discloser will be informed of the outcome where reasonably practicable.

If the discloser is unhappy about the outcome of an investigation, he or she should make a further report to the nominated person, and if there is good reason to do so, the concern will be investigated again.

Any deliberate false or malicious allegations will be taken very seriously and appropriate disciplinary action will be taken. Where an employee acts in a malicious way (for example by leaking information to the press), the protection outlined above will not apply and the employee will be subject to disciplinary action which could result in summary dismissal for gross misconduct.

If an employee has a concern and is unsure whether this is the appropriate procedure for raising it, or is unhappy about the final outcome of an investigation, he or she can contact the independent charity, Public Concern at Work on:

Telephone: 0207 404 6609

E-mail: whistle@pcaw.co.uk

Website: www.pcaw.co.uk for independent advice.

The Managing Director, Head of HR and a Board member will monitor the use and effectiveness of the whistle blowing policy and record disclosures in the Whistleblowing Register.

How will the matter be progressed?

A written acknowledgement of the receipt of the concern will be sent within three working days to the discloser at his/her home address. Because of the nature of investigations of this type it is not possible to stipulate specific timescales beyond the initial acknowledgement. However, the discloser will be kept informed of the progress of the investigation and Instep UK will use its best endeavours to bring matters to a speedy conclusion.

On receipt of the disclosure, the nominated person/s will normally offer to interview, in confidence, the person making the disclosure. Consideration should be given by the nominated person/s to the timing, location and duration of any such interview as well as any special requirements. A work colleague may accompany the discloser. The nominated person/s may be accompanied by an administrative assistant or H.R. Advisor to take notes. The nominated person/s will carry out a preliminary investigation to establish the facts of the matter and assess whether the concern has foundation and can be resolved internally.

The initial assessment may identify the need to:

- take further action or not
- involve third parties to provide further information, advice or assistance, for example, involvement of other members of Instep UK staff, Instep UK 's auditors, legal or personnel advisors, the police, the DfE and ESFA.

Invoke Instep UK's disciplinary procedures:

- seek redress through the grievance or complaints procedure instead
- pursue simultaneous investigations.

Recommendations arising from the initial investigation will be made to the Directors.

Records will be kept of work undertaken and actions taken throughout the investigation. The nominated person/s in conjunction with the Directors, if appropriate, will consider how best to report the findings and what corrective action needs to be taken.

Recommendations on corrective action will be made to the Directors.

Recommendations made and the action taken in response will be documented. It is the responsibility of the nominated person/s to keep the discloser informed on a timely basis of progress with investigations undertaken. The discloser will be informed, in writing, also on a timely basis, of the results of the investigation and the action taken to address the matter. Depending on the nature of the concern or allegation and whether or not it has been substantiated, the matter will be reported to Prime Contractors and/or the ESFA/DWP or appropriate funding Commissioner.