

WHISTLEBLOWING POLICY

1 – Policy Overview

1.1 - Policy Statement

This Whistle-blowing Policy has been introduced in response to the Public Interest Disclosure Act 1998 and provides a procedure which enables employees to raise concerns about what is happening at work, particularly where those concerns relate to unlawful conduct, financial malpractice or dangers to the public or the environment. The object of this policy is to ensure that concerns are raised and dealt with at an early stage and in an appropriate manner.

1.2 - Policy Purpose

Projecting Success is committed to its Whistle-Blowing Policy. If you raise a genuine concern under this policy, you would not be at risk of losing your job, nor would you suffer any form of detriment as a result. As long as you are acting in good faith and in accordance with this Policy, it does not matter if you are mistaken.

2 - Whistleblowing

2.1 - Our Responsibility

- All concerns raised will be treated fairly and properly, any individual making a disclosure will retain his/her anonymity unless he or she agrees otherwise.
- Projecting Success will ensure that no one will be at risk or suffering any form of retribution from raising a concern even if he/she is mistaken.

Whistleblowing applies if you believe that the company is involved in any form of wrongdoing such as:

- Committing a criminal offence
- Failing to comply with a legal obligation
- Endangering the health and safety of an individual
- Environmental damage

- Projecting Success staff that offer radical or extremists views and where these are promoted to encourage people to become members/followers. Projecting Success employees should in the first instance report your concerns to the Prevent Duty SPOC. If you are not satisfied with the explanation or reason given to you, you should raise the matter with the appropriate organisation or body see list of referral agencies below.
- Using information such as confidential apprentice details for their own means and gains, sharing this information with others and not complying with Projecting Success' policies and procedures relating to Information Security.

Projecting Success encourage staff to use the procedure if you are concerned about any wrongdoing at work. However, if the procedure has not been invoked in good faith (e.g. for malicious reasons or in pursuit of a personal grudge), then it will make you liable to immediate termination of engagement or such lesser disciplinary sanction as may be appropriate in the circumstances.

2.2 - Differences from the Grievance Procedure (Employees)

This policy does not apply to raising grievances about an employee's personal situation. These types of concerns are covered by Projecting Success' Grievance Procedures. The Whistle-Blowing Policy is primarily concerned with where the interests of others or Projecting Success itself are at risk. It may be difficult to decide whether a particular concern should be raised under the Whistle-Blowing Policy or under the Grievance Procedure, or under both. If you have any doubt as to the correct route to follow, please consult your manager.

2.3 - Protecting the Employee

Projecting Success will not tolerate harassment or victimisation of anyone raising a genuine concern under the Whistle-Blowing Policy. If a request is made, the identity of the individual making the request will be protected and all possible steps will be taken to prevent the identity becoming known. If the situation arises where it is not possible to resolve the concern without revealing the identity (e.g. if the evidence is required in court), the best way to proceed with the matter will be discussed with the individual.

Staff should be aware that, by reporting matters anonymously, it would be more difficult for Projecting Success to investigate them, to protect the employee and provide employee feedback. Accordingly, while Projecting Success will consider anonymous reports, this Policy does not cover matters raised anonymously.

2.4 - How the Matter Will Be Handled

Once an individual has informed Projecting Success of their concerns, they will be examined, and Projecting Success will assess what action should be taken. The individual will be told who is handling the matter, how they can be contacted and whether any further assistance will be needed. If the individual has any personal interest in the matter, this should be declared at the outset. If the concern falls more properly within the Grievance Procedure, then the individual would be informed of this.

2.5 - How to Raise a Concern

If an individual has a concern about malpractice, this should be raised initially with the individual's line manager. This may be done orally or in writing. They should specify at the outset if they wish the matter to be treated in confidence.

If these channels have been followed and the individual still has concerns, or if they feel the matter is so serious that they cannot discuss it with the above, they should discuss it with the Director.

If they feel that matters relating to fraud or impropriety have been drawn to the attention of the Director and s/he has unreasonably refused to act upon them, then such matters can be drawn to the attention of Projecting Success' Chief Executive Officer.

2.6 - Matters Raised Maliciously

Employees who maliciously raise a matter that they know to be untrue will be subject to the Disciplinary Policy and Procedure.

2.7 - Associated Policies

[Equality and Diversity Policy](#)

[Health and safety Policy](#)

[Safeguarding Policy](#)

Version History				
Date	Version	Details of Change	Revision By	QA
24/03/2023	5	<ul style="list-style-type: none"> - Added Version Control - Updated Formatting - Added links to policies 	Laura Morley	