



# Whistleblowing Policy

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## Document History

Version	Issue Date	Owner	Revision Notes
1	01/04/2022	Directors	Rebranded and revised in full

This document is issued, controlled, and can only be modified after proposed modifications have been accepted by the Operations Director and have been accepted by the Company Directors.

The latest version will be maintained on the company central storage area (Intranet).

## Purpose

The whistleblowing policy gives employees an account of what is, or is not, acceptable behaviour and allows sensitive issues to be dealt with internally, encouraging employees to report wrongdoing while protecting the organisation from unexpected public disclosures.

It is not a substitute for other management procedures, such as performance appraisals and disciplinary and grievance procedures. It is important, however, that such interactions between managers and employees should be documented to enable the distinction to be made between proper and improper practice.

Key Training Ltd are committed to:

- An open and communicative culture
- Supportive routes of communication of concerns
- Fair and impartial investigation procedure
- Safeguarding against abuse of the policy
- Ensuring confidentiality within contracts of employment

## Scope

This policy applies to all staff employed by Key Training Ltd under a Contract of Employment, all agency staff and all independent contractors and consultants working within Key Training Ltd, including subcontractors.

The key principles for whistleblowing are:

- Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. You should be watchful for illegal or unethical conduct and report anything of that nature that you 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 person who raised the issue.
- No one will be victimised for raising a matter under this procedure. This means that your continued employment and opportunities for future promotion or training will not be prejudiced because you have raised a legitimate concern. Victimisation of a colleague for raising a qualified disclosure will be a disciplinary offence.
- If misconduct is discovered as a result of any investigation under this procedure our disciplinary procedure will be used, in addition to any appropriate external measures.
- Maliciously making a false allegation is a disciplinary offence.
- An instruction given to you to cover up wrongdoing is itself a disciplinary offence. If you are told not to raise or pursue any concern, even by a person in authority such as your Line Manager, you should not agree to remain silent. You should report the matter to a Director.

## Policy and Process

Whistleblowing inside the workplace is the reporting, by employees or ex-employees, of wrongdoing such as fraud, terrorism, extremism, malpractice, mismanagement, breach of health and safety law or any other illegal or unethical act, either on the part of management or by fellow employees.

The aim of this policy is to provide safeguards to protect staff delivering or working for Key Training Ltd who raise genuine concerns about malpractice in connection with the organisation. This protection is available to staff who have reasonable belief that disclosure is in the public interest: the policy is not intended to cover private matters, for example in relation to an individual's contract of employment.

Key Training Ltd will maintain a whistleblowing policy in line with relevant legislation and good practice. Any change will be subject to consultation with representatives of recognised trade unions or the appropriate staff.

Key Training Ltd will make every effort to keep staff's identity confidential if they wish this to be the case. However, in certain circumstances such as requests from the police, it may be necessary for Key Training Ltd to make a disclosure.

Key Training Ltd encourage staff to make appropriate use of the procedure but will take disciplinary action in response to maliciously unfounded disclosures or disclosures that do not follow the procedure.

Employees wishing to invoke the whistleblowing policy should do so through either their line manager, senior manager or if required the Board of Directors, following the process flow at the end of this section.

If it is not appropriate to raise this concern with the identified people, then the matter should be raised with the Chairman.

The next course of action would be to the appropriate external body such as the funding body or organisation.

Any employee invoking the whistleblowing policy will be assured of a fair and impartial investigation and will be supported throughout the process.

You should be prepared to provide the information below:

- an outline of the known or suspected wrongdoing
- details, to the best of your knowledge, about when, where and how it occurred
- a list of the names of those suspected of being involved (both within Key Training Ltd and externally)
- a list of the names of anyone who may have relevant information
- details of how you came to know about the suspected activities
- what, if any, do you estimate to be the value of the loss to Key Training or other parties
- what, if any, breaches of internal controls, policy, procedure, or other requirements you believe took place
- any specific recommendations you have for actions
- the names of anyone who you have discussed or reported this incident to

- your name and contact details. Please note – these will be kept confidential as far as is reasonably practicable
- the date and time of making the report.

You will not be expected to prove the wrongdoing that you believe you have witnessed or suspect.

### **Anonymity**

We understand that disclosures made under this policy may involve highly confidential and sensitive matters and that you may prefer to make an anonymous disclosure. When this is the case, we will endeavour to investigate your concerns fully, although a full investigation may be impeded if we cannot obtain further information from you.

An investigation will be conducted as speedily and sensitively as possible in accordance with all relevant laws and regulations. If appropriate, you will be regularly informed on the progress of these investigations and any action to be taken. The purpose of this investigation is:

- to establish if a wrongdoing has occurred, and if so to what extent
- to minimise the risk of further wrongdoing, to prevent any further loss of assets, damage to reputation and to protect all sources of evidence.

Key Training Ltd will endeavour to handle investigations as fully, promptly and fairly as possible. As far as reasonably practicable, the confidentiality of the person reporting the suspected wrongdoing will be maintained.

**Raising a concern**

- An employee who has a concern, should raise this initially with their manager to talk through the concern.
- If it is not appropriate to discuss the concern with your line manager, your concern should be raised with HR or another member of the senior management team.

**Formal investigation**

- If the matter and concern in question cannot be resolved locally, the matter will be investigated by the Key Board.
- Meetings will take place with formal record keeping observed.

**Formal whistleblowing**

- If you feel the matter has not been resolved, the employee can raise the matter with the company Chairman via email.
- Acknowledgement of the formal written notification will be provided within 10 working days of the Chairman receiving this
- All investigations will take place and will be recorded as appropriate.

## Lines of Responsibility

As soon as you become aware of any suspected wrongdoing, you should notify the matter to one of the people below:

- your line manager
- HR
- Operations Director
- Sales Director

Or, in situations where you feel uncomfortable in approaching these people, as you feel that they may not manage your issue appropriately or this would serve no purpose, you should report concerns directly to the Chairman.

## Non-Compliance

Failure to comply with this policy may result in capability / disciplinary action.

## Related policies

- Disciplinary policy
- Safeguarding Young People and Vulnerable Groups (including Prevent) Policy
- Recruitment and selection policy
- Anti-Bribery policy
- Modern Slavery and Human Trafficking Policy



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