

INTEQUAL

Whistleblowing Policy

Version 2

Ref – Whistleblowing Policy

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**Approved by: Rod Harris
(Board Representative)**

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Our commitment

Intequal's mission is to place the quality of the learning experience at the heart of everything we do whilst growing a highly successful business and our vision is to be the industry leader, delivering high quality, effective training solutions that add tangible value through strong partnerships, efficient delivery, leading edge technology, innovation and expert people. It is through our people that we will achieve our vision. They are the most important asset in our business, as they bring to life what we do. All employees act as representatives of Intequal and our employer brand. The success of a sector, function or department depends on the performance and behaviours of our people.

Intequal is committed to operating business in an open and accountable way. We support our employees, and others that we deal with, to come forward and voice concerns about any aspect of our work. We recognise that employees are often the first to realise that there may be something seriously wrong happening within the business. They may not say anything because they worry about being disloyal to their colleagues or because they fear victimisation. They might feel that it is easier to remain silent rather than voice what may just be a suspicion of bad practice. We have created this policy to encourage you to come forward if you have concerns and to enable you to do so without the fear of any disadvantage.

Objectives

This policy aims to give you confidence to raise any concerns rather than overlook the problem or 'blow the whistle' externally and to reassure you that you will be protected from any disadvantage. It also gives guidance on how to go about voicing any concerns and tells you how we will respond.

Scope

This policy applies to anyone working for or on behalf of Intequal. This includes Intequal employees, casual workers, agency workers, freelancers, self-employed contractors and any other third-party delivering services on behalf of Intequal.

Key contacts

Key Contact	Job Role	Email Address
Rod Harris	Director of Curriculum and Quality	Rod.harris@intequal.co.uk

Definitions

Keywords used in the policy and what they mean in relation to this policy:

Keyword	Definition
Whistleblowing	Whistleblowing is a term used for what is legally known as a Public Interest Disclosure, which is when an employee discloses information about malpractice/ wrongdoing they discover occurring in the company.

What isn't covered by whistleblowing?

The procedure should not be used where there are issues of poor performance or a lack of professionalism; nor should it be used to resolve personal disputes. It should only be used where there is wrongdoing: whether it is intentional or done unknowingly.

What is the purpose of the Public Interest Disclosure Procedure?

The Public Interest Disclosure Act (PIDA) was produced to legally protect employees against being dismissed or penalised by their employers because of making a disclosure. The Company's Public Interest Disclosure procedure facilitates the PIDA, ensuring that proper protection is given to any person/s making a disclosure.

What constitutes malpractice/wrongdoing?

Examples of malpractice/ wrongdoing include:

- Financial malpractice
- Breach of any of regulations
- Endangering health and safety
- Criminal activity
- Professional malpractice

How are disclosures made?

Disclosures should be made verbally or in writing to the designated “assessment officer”. The Assessment Officer will conduct an initial investigation and submit his/ her findings, including a recommendation on the best way to proceed, to a Disclosure Officer. Several actions are open to a Disclosure Officer, including an informal resolution, disciplinary action, or referral for investigation under a more appropriate procedure or to a suitable external organisation. The Assessment Officer will act as the point of contact for the person/s making the disclosure.

In any instance of disclosures being made a report to the awarding body must be made immediately.

(See employee handbook for named persons and contact points)

Can disclosure be made outside the company?

The Procedure will afford protection to individuals making a disclosure outside of the Company if there is a reasonable belief that the disclosure shows malpractice/ wrongdoing. In certain circumstances, the Company might be obliged to make a report to the Education and Skills Funding Agency, the police or another appropriate public body. This will not affect the protection afforded to the discloser.

Whistle-blowers can access as required: Gov.UK Whistleblowing for Employees facility (<https://www.gov.uk/whistleblowing>) as well as ACAS (<http://www.acas.org.uk>). The policy is available to all employees via the company intranet. The amended Staff Handbook is also available on the company intranet.

Employers and learners can access this policy via Learning Assistant as well as on our website.

Can disclosure be made anonymously?

Members of the Company are expected to put their name to any disclosures they submit, although the Company might consider anonymous disclosures if the matter raised is of sufficient gravity and accompanied by evidence.

Confidentially

All concerns will be treated in confidence and if you prefer not to reveal your identity, we will make every effort to keep it that way. It might be difficult to keep it hidden in every circumstance because the investigation process may reveal the source of the information. We may also ask you to come forward as a witness or ask you for a statement. Should we need to disclose your identity, we will make you aware of this and explain the reasons why.

Data protection

The company processes personal data collected during a whistleblowing investigation stage and any subsequent action in accordance with its data protection policy. Data is held securely and accessed by and disclosed to individuals only for the purposes of completing the whistleblowing investigation procedure. Inappropriate access or disclosure of team member data constitutes a data breach and should be reported in accordance with the organisation's data protection policy immediately. It may also constitute a disciplinary offence, which will be dealt with under the disciplinary procedure.

Changes to this policy

Intequal review policies and subsequent documents will be published on our website annually. The policy issue and review date can be found in the footer of the document.

History

Version	Author	Change	Date
V2	Vini Pathmanathan	Annual Review New policy format	05/05/2023
V2	Abbie Hellyer	New policy format approval	25/05/2023