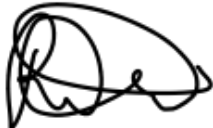




Multi Trades Training

Whistleblowing Policy & Procedure

Review Date: July 2024

Approved by	RK Jones	Position	Director
		Date	15 th June 2023

Document Control

Date	Review & Revision	By
15.06.23	Added Operations Director as first person to contact with suspicions and CEO & Director as final.	Quality Lead
		Quality Lead

Policy Statement

Multi Trades Training (MTT) is committed to conducting its business through practising the highest standards of honesty and integrity.

While organisations may face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct this policy is designed to allow you to raise concerns about possible malpractice, mismanagement, illegal, unethical or negligent professional conduct without the fear of harassment or victimisation.

We encourage anyone with concerns about any aspect of our work to voice them. Individuals may raise concerns without fear of reprisal in accordance with the Public Interest Disclosure Act 1998. We are committed to encouraging and enabling concerns to be raised and addressed within MTT rather than ignoring the problem or "blowing the whistle" outside in the first instance.

MTT will ensure that an appropriate investigation is carried out and that your concern is considered seriously. This policy is intended to cover major concerns that fall outside the scope of other procedures.

Please note that this policy does not replace the Grievance procedure.

Raising a concern is sometimes referred to as 'blowing the whistle', 'making a disclosure' or 'speaking up' about serious wrongdoing, malpractice, or impropriety including irregularities in the running of the Company, or of the activities of colleagues working within the company.

Public Interest Disclosure Act

The Public Interest Disclosure Act 1998 (PIDA) offers a framework of protection against victimisation for people who blow the whistle on criminal behaviour or other wrongdoing. A disclosure qualifies for protection if, in the reasonable belief of the individual, it relates to one or more of the following actions:

- A criminal offence
- Concerns, suspicions or unease regarding the safety of a child or vulnerable adult
- A failure to comply with a legal obligation
- 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.

Disclosure will be protected, provided it is made in good faith and the whistleblower has a reasonable suspicion that the alleged malpractice has occurred, is occurring or is likely to

occur and believes their disclosure is in the public interest and not for their own personal interest.

Employees raising a concern under this policy will not be at risk of any form of retribution as a result, including any risk of losing their job. Additional protection is given to employees suffering bullying or harassment from colleagues as a result of their disclosure.

Customers receiving a service from MTT are also protected from victimisation as a result of whistleblowing and will not receive a lesser service as a result of a disclosure.

Basic Principles

This procedure seeks to:-

- provide a fair and consistent means of dealing with concerns raised by staff,
- encourage you to feel confident in raising serious concerns and to question and act upon concerns,
- provide avenues for you to raise those concerns and receive feedback on any action taken,
- ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied,
- reassure you that you will be protected from possible reprisals or victimisation if you have a reasonable belief that you have made any disclosure in good faith.

There are existing procedures in place to enable you to lodge a grievance relating to your own employment.

Those Covered by this Policy

The policy applies to all employees, Directors, associates and consultants working for MTT. Your concern will be investigated by an representative of MTT, whose appointment will be confirmed by the Management Team as investigating officers, usually the Director or Quality Manager.

Harassment or Victimisation :MTT recognises that the decision to report a concern can be a difficult one to make. If what you are saying is true, you should have nothing to fear. MTT will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith.

Confidentiality: All concerns will be treated in confidence and every effort will be made not to reveal your identity if you so wish. At the appropriate time, however, you may need to come forward as a witness.

Anonymous Allegations: This policy encourages you to put your name to your allegation whenever possible. Concerns expressed anonymously are much less powerful but will be considered at the discretion of the appointed investigator. In exercising this discretion the factors to be taken into account would include:

- the seriousness of the issues raised
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources.

Untrue Allegations : If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you. If, however, you make an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against you.

Types of Concerns

'Whistleblowing' refers to the disclosure by individuals of suspected malpractice, illegal acts or omissions at work. Examples of the types of concerns that may be raised include:

- Possible criminal activity
- Failure to comply with legal obligations or regulatory requirements
- Possible fraud or irregularities
- Unauthorised use of public funds or other assets
- Improper accounting practices
- Offering, taking or soliciting bribes
- Theft or misuse of property or assets
- Racial, sexual, disability or other discrimination
- Suspicion of radicalisation (*)
- Health and Safety concerns
- Damage or potential damage to the environment
- Data protection or information security breaches
- Unauthorised disclosure of confidential information
- Conduct likely to damage the company's reputation
- Unethical conduct
- Actions which are intended to conceal any of the above

This list is not exhaustive and simply representative of the types of concerns which may be raised.

(*) As an education provider, MTT has a legal requirement to comply with the Government's 'Prevent Strategy' aimed at preventing radicalisation.

We will do this by escalating incidences and concerns using our safeguarding processes and we promote Equality & Diversity and British Values with our learners to help ensure they are integrated into mainstream society and are less vulnerable to radicalisation and extremism.

How to Raise a Concern

You should raise concerns with the Operations Director, as the first point of contact but if this is not appropriate then you can speak to the Director and CEO.

Concerns may be raised verbally or in writing however you should if possible give:-

- the background and history of the concern (giving relevant dates);
- the reason why you are particularly concerned about the situation.

Although you are not expected to prove beyond doubt the truth of an allegation, you will need to demonstrate to the appointed investigator that there are reasonable grounds for your concern.

What is expected of those raising a concern;

Employees making a disclosure are expected to:

- Have a reasonable suspicion about the malpractice.
- Have a reasonable belief that the information and any allegation is true.
- Not make the disclosure for personal gain.

Protection for those raising a concern

In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The action taken by MTT will depend on the nature of the concern. The matters raised may be:

- investigated internally
- referred to the Police
- subject of an independent inquiry

Anyone notified of a concern must:

- ensure that concerns are taken seriously, treated sensitively and without undue delay;
- investigate properly noting relevant details/collecting any documentary evidence before making an objective assessment of the concern;
- keep the whistleblower advised of progress; and
- ensure that the action necessary to resolve a concern is taken.

Concerns or allegations that fall within the scope of existing procedures e.g. Anti-Fraud, will normally be referred for consideration under those procedures.

Within **ten working days** of a concern being raised, the person investigating the concerns will write to tell the whistleblower:

- acknowledging that the concern has been received,
- indicating how we propose to deal with the matter,
- supplying information about the process giving an estimate of how long it will take to provide a final response,
- supplying you with information on staff support mechanisms, and
- telling you whether further investigations will take place and if not, why not.

If you are not satisfied with the way in which the investigation has been carried out, you may raise your concerns with the CEO and Managing Director.

Confidentiality

The company encourages employees to put their name to any disclosures they make. Concerns expressed anonymously are much less credible and are more difficult to investigate, but they may be considered at the discretion of the company. In exercising this discretion, the factors taken into account will include:

- The seriousness of the issues raised.
- The credibility of the concern.
- The likelihood of confirming the allegations from attributable sources.

All concerns will be dealt with confidentially. It is also imperative that the concern is raised appropriately and discretion and confidentiality is maintained by those raising the concern.

Investigating Procedure

Action taken will depend upon the nature of the concern. Disclosures will be assessed to:

- Determine whether a further investigation should be conducted.
- Determine the form the investigation should take.
- Appoint an investigating officer to undertake the investigation.

If it is decided that an investigation is required, an investigating officer will be appointed who will aim to abide by the following steps:

- Obtain full details and clarifications of the concern.
- Inform the employee against whom the complaint has been made as soon as possible.
- Where the matter relates to a fraud, financial malpractice, bribery, corruption or criminal activity, MTT reserves the right to withhold the nature of the enquiry from the employee, until all evidence has been secured.

- Disclosures relating to matters of fraud, bribery, corruption, financial malpractice or impropriety will be investigated in accordance with MTT Malpractice and Anti-fraud, Bribery and Corruption Policy.
- Investigate the concern with third parties / witnesses where possible and obtain objective statements.
- Secure all evidence in an admissible format.
- The discloser will, as far as possible, be kept informed of progress and, if appropriate, the final outcome of the investigation.
- Reporting of the findings will depend on the nature of the disclosure.
- Confidential records will be maintained for monitoring purposes.

External Reporting

This policy has been developed in order to provide employees with the guidance and reassurance they need to raise a concern internally. However, it is recognised that there may be circumstances where employees feel it necessary to raise their concerns outside the business and in these circumstances employees have a number of external avenues open to them.

Protect (formerly Public Concern at Work)

Protect is the UK's whistleblowing charity, aiming to protect workers' rights and organisations' reputations, by encouraging safe and responsible whistleblowing.

Protect contact details: T: 020 3117 2520

Email via web form: [Protect Advice Line](#)

Website: <https://protect-advice.org.uk>

Employees can also raise their concerns with the proper authority (guidance is available from [GOV.UK](#) - whistleblowing for Employees, along with a [list of prescribed people and bodies](#)).

The list includes:

- Environment Agency
- Financial Services Agency
- HR Revenue and Customs,
- Information Commissioner
- Health & Safety Executive and,
- Pensions Regulator.

Outcomes

Depending on the findings of the investigation, outcomes may vary from no further action at all to sanctions against perpetrators. Such sanctions may range from a verbal warning to dismissal without notice in cases of gross misconduct and criminal prosecution.

Offences committed as determined by the Bribery Act 2010 carry severe penalties including unlimited fine or up to 10 years imprisonment.

The contact point for further advice is:

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