



Whistleblowing Policy

V3

Family:	Human Resources
Manager Responsible:	Ashleigh Penny
Reviewed and Updated:	November 2021
Issue Date:	June 2021
Next Review Date:	June 2022

1. Introduction

- 1.1 The Skills Network is committed to conducting its business with honesty and integrity and aims to achieve the highest possible standards of service and best practise.
- 1.2 We expect everyone to maintain the same high standards too. However, all businesses face the risk of malpractice and wrongdoing, and we take these actions very seriously and aim to prevent and eliminate any such acts.
- 1.3 We encourage everyone to raise any concerns of this nature within the business without fear of suffering a detriment or dismissal, enabling us to prevent or stop wrongdoing/malpractice,
- 1.4 We will treat any concerns raised seriously and will protect and support any individual who makes a disclosure in line with this policy.
- 1.5 This policy does not form part of any employment contract; TSN reserves the right to amend this policy at any time without prior notice.

2. Who can raise a concern under this policy?

- 2.1 All current and former employees, workers, officers, consultants, and contractors of our business, including home workers, trainees, apprentices, agency workers, casual workers and limited company contractors.
- 2.2 There is no qualifying length of service to raise a concern under this policy.

3. When to use this policy

- 3.1 This policy should be used to report concerns of malpractice or wrongdoing in relation to our activities where you have information which you reasonably believe one of the following may have occurred:
 - That a criminal offence has been committed, is being committed or is likely to be committed;
 - That a person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject;
 - That a miscarriage of justice has occurred, is occurring or is likely to occur;
 - That the health or safety of an individual has been, is being, or is likely to be, endangered;
 - That the environment has been, is being, or is likely to be, damaged; or
 - That any of the above malpractices have been, are being, or are likely to be, deliberately concealed. This applies whether the malpractice has already occurred, is currently in progress, or is likely to happen in the future.
- 3.2 You should reasonably believe, rather than opinion or feeling, that the disclosure is being made in the public interest.

4. Disclosures that are not covered by this policy

- 4.1 You will not qualify for protection under this policy if you commit an offence in making the disclosure, or if you disclose a matter that is subject to legal, professional privilege (for example, correspondence between TSN and our lawyers regarding a specific case).
- 4.2 If your concern relates to your own treatment as our employee, including your personal circumstances at work, you should raise it under our grievance procedure instead, unless you reasonably believe that the matter is in the public interest.
- 4.3 If you are a non-employee, you should use our complaints procedure instead.

5. How to raise a concern

- 5.1 If you have any concerns of the types of malpractice/wrongdoing covered by this policy, you should, in the first instance, make a disclosure to your line manager.
- 5.2 If you feel that you cannot make a disclosure to him or her, you should raise the issue with the Director of HR. Alternatively, depending on the nature you can raise this with the Designated Safeguarding Lead or another member of the Safeguarding Team.
- 5.3 It is preferable for the disclosure to be made in writing so that we can keep an exact record of your concern and supported with relevant information.
- 5.4 You are not expected to provide evidence of your concern beyond reasonable doubt, however, you will usually need to provide the following information as a minimum:
- the nature of the concern;
 - why you believe it to be true;
 - the background and history of the concern; and
 - relevant dates, where possible.
- 5.5 We encourage you to give your name when reporting your concern. It may be more difficult for us to protect your position or give you feedback on the outcome of investigations if you choose to remain anonymous.

How we respond to concerns raised under this policy

- 5.6 We are committed to ensuring that all disclosures raised in accordance with this policy will be dealt with objectively, consistently, fairly and professionally.
- 5.7 We will take the time to listen to any issues raised and arrange a meeting to discuss your concern and establish the background and facts.
- 5.8 Any concerns you raise in line with this policy will be recorded in our Whistleblowing Report Register.
- 5.9 After the meeting, we will decide how to respond to deal with and investigate the situation appropriately and within a reasonable time frame.
- 5.10 We will keep you informed of the progress of the investigation and its completion, however, would need to respect confidentiality as required.
- 5.11 We will consider any concerns raised anonymously at our discretion, based on factors such as the seriousness of the issue raised, the credibility of the concern and the likelihood of confirming the allegation from other sources.
- 5.12 If disciplinary or other proceedings follow the investigation, we may need to ask you to be a witness. If you agree to this, you will be offered advice and support.

6. Confidentiality

- 6.1 All concerns raised will be treated as confidential and every effort will be made not to reveal the identity of any individual who raises a concern. Unless the law requires otherwise, we will only make disclosures to third parties or other staff with your consent.

7. Raising your concern externally (exceptional cases)

- 7.1 The main purpose of this policy is to give all our employees the opportunity and protection they need to raise concerns internally.
- 7.2 We strongly encourage individuals to seek appropriate advice before reporting a concern to an external person. Public Concern at Work is a leading independent charity whose main objective is to promote compliance with the law and good practice in the public, private and voluntary sectors. They are a source of further information and advice and operate a confidential helpline. ACAS also operate a free confidential helpline that you can contact for advice. The contact details for both organisations are set out in the information and contacts section under paragraph 8 below.
- 7.3 If you feel you cannot raise your concerns internally, the law recognises that it may be appropriate for you to raise the matter with another approved person, such as a regulator, professional body, or an MP. A list of the relevant prescribed people and bodies, available on the gov.uk website via the following link:

<https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies>

8. Further information and contacts

- 8.1 If you have any queries about the application of this policy, please contact **HRenquiries@theskillsnetwork.com in the first instance.**
- 8.2 Protect (formerly Public Concern at Work) is a source of further information and advice. It also provides a free helpline offering confidential advice on 020 7404 6609. Further information is available on their website at <https://protect-advice.org.uk/>.
- 8.3 The Advisory, Conciliation and Arbitration Service (ACAS) also has a free helpline that you can contact for further advice. The ACAS telephone number is: 0300 123 1100 and the helpline is open Monday to Friday from 8am to 8pm, and Saturday from 9am to 1pm. The website can be found here: www.acas.org.uk.
- 8.4 If you are a member of a recognised trade union, you can also seek information and advice from your trade union representative.

