



## Whistle Blowing Policy

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### GENERAL PRINCIPLES

Employees are often the first to realise that there may be something seriously wrong within the Company. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the Company. They may also fear harassment or victimisation. In these circumstances it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.

Integer Training is committed to the highest possible standards of openness, probability, and accountability. In line with that commitment we expect from employees, (internal and external) and stakeholders that we deal with, who have serious concerns about any aspect of Integers' work to come forward and voice those concerns. It is recognised that most cases will have to proceed on a confidential basis.

This policy document makes it clear that you can do so without fear or victimisation, subsequent discrimination or disadvantage. This whistle-blowing policy is intended to encourage and enable employees to raise serious concerns within Integer Training rather than overlooking a problem or 'blowing the whistle' outside.

This policy applies to all employees and stakeholders working for Integer Training. These procedures are in addition to the Company's complaints procedures and other statutory reporting procedures applying to directorates. Integer Training is responsible for making everyone aware of the existence of these procedures.

**AIMS;** This policy aims to:

- Encourage you to feel confident in raising serious concerns and to question and act upon concerns about practice
- 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. The whistle-blowing policy is intended to cover major concerns that fall outside the scope of other procedures. These include:

- Conduct, which is an offence or a breach of law
- Disclosures related to miscarriages of justice
- Health and safety risks, including risks to the public as well as other employees
- Damage to the environment
- The unauthorised use of public funds
- Possible fraud and corruption
- Sexual or physical abuse of clients, or
- Other unethical conduct

Thus, any serious concerns that you have about any aspect of service provision or the conduct of officers or employees of Integer Training or others acting on behalf of the Company can be reported under the whistle-blowing policy. This may be about something that:

- Makes you feel uncomfortable in terms of known standards, your experience or the standards you believe the Company subscribes to; or

Is against the Company's policies or

- Falls below established standards of practice; or
- Amounts to improper conduct

This policy does not replace Integers' complaints procedure.

## **SAFEGUARDS**

### **Harassment or Victimisation**

Integer is committed to good practice and high standards and wants to be supportive of employees, learners and stakeholders.

Integer Training 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 because you will be doing to your employer and those for whom you are providing a service.

Integer Training 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.

Any investigation into allegations of potential malpractice will not influence or be influenced by any disciplinary or redundancy procedures that already affect you.

## **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 Jasbir Behal (Managing Director). 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.

## **HOW TO RAISE A CONCERN**

As a first step, you should normally raise concerns with your immediate manager or a member of the Senior Management Team. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if you believe that management is involved you should approach the Managing Director (Jasbir Behal)

Concerns may be raised verbally or in writing. Anyone, who wishes to make a written report, is invited to use the following format:

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

The earlier you express the concern the easier it is to take action. Although you are not expected to prove beyond doubt the truth of an allegation, you will need to demonstrate to the person contacted that there are reasonable grounds for your concern. Obtain advice/guidance on how to pursue matters of concern by contacting Jacky Maynard by email [jacky@integer.co.uk](mailto:jacky@integer.co.uk) or the direct dial no. 01288 357350.

If ultimately you feel you have to take the matter externally, the links in the section 'How the Matter Can be Taken Further' following organisations offer useful advice and guidance:

You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns.

You may invite a professional association representative or a friend to be present during any meetings or interviews in connection with the concerns you have raised.

## HOW INTEGER WILL RESPOND

Integer Training will respond to your concerns. Do not forget that testing out your concerns is not the same as either accepting or rejecting them.

Where appropriate, the matters raised may:

- Be investigated by management, internal audit, or through disciplinary process
- Be referred to the police
- Form the subject of an independent inquiry

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 overriding principle which Integer will have in mind is interests of its learners, employees and stakeholders.

Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required this will be taken before any investigation is conducted. Within ten working days of a concern being raised, the responsible person will write to you:

- Acknowledging that the concern has been received
- Indicating how we propose to deal with the matter
- Giving an estimate of how long it will take to provide a final response
- Telling you whether any initial enquiries have been made
- Supplying you with information on staff support mechanisms, and
- Telling you whether further investigations will take place and if not, why not

The amount of contact between the Senior Management Team considering the issues and you will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, Integer will seek further information from you.

Where any meeting is arranged, off-site if you wish, professional association representative or a friend can accompany you.

Integer Training will take steps to minimise any difficulties, which you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings Integer Training will arrange for you to receive advice about the procedure.

Integer Training accepts that you need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform you of the outcome of any investigation.

## THE RESPONSIBLE PERSON

The Managing Director (Jasbir Behal) has overall responsibility for the maintenance and operation of this policy. A record of concern will be raised and the outcome (but in a form which does not endanger your confidentiality) will be reported as necessary to the Company.

## HOW THE MATTER CAN BE TAKEN FURTHER

This policy is intended to provide you with an avenue within the Company to raise concerns. Integer Training hopes you will be satisfied with any action taken. If you are not, and if you feel it right to take the matter outside the Company, the following are possible contact points:

- Public Concern at Work (tel: 020 3117 2520 or message through the website <https://protect-advice.org.uk/contact-protect-advice-line/> a registered charity whose services are free and strictly confidential
- Your local Citizens Advice Bureau
- Relevant professional bodies or regulatory organisations
- A relevant voluntary organisation
- The police

Other useful links for information, advice or guidance are:

<https://nationalguardian.org.uk/>

<https://www.gov.uk/whistleblowing>

<https://www.acas.org.uk/advice>

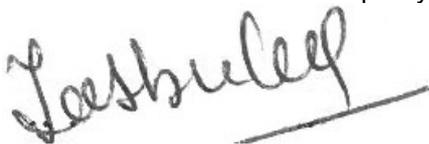
If you do take the matter outside of Integer Training, you should ensure that you do not disclose confidential information. Check with a contact in the Senior Management Team.

The Management will be responsible for implementing and monitoring the effectiveness of this policy. It is, however, the duty and responsibility of all working on behalf of Integer Training Limited, in whatever capacity, to promote the Whistle Blowing Policy within their own spheres of responsibility.

**Contact:**

Jacky Maynard  
General Manager  
Integer Training Ltd  
9 Bude Business Centre  
Bude,  
Cornwall  
EX23 8QN

**Declaration:** I will review and revise this policy as necessary and at regular intervals:

A handwritten signature in black ink, appearing to read 'Jasbir Behal', is written over a horizontal line.

Signature of Jasbir Behal, Managing Director, Integer Training Ltd

Date: 14 January 2023