##### WHISTLEBLOWING POLICY

Alliance Learning takes a serious view of fraudulent behaviour, malpractice and general abuse, occurring in or out of the work place. If evidence of such an occurrence comes to light, Alliance Learning intends to deal with it quickly and serious disciplinary action will be taken against any employee found guilty of such offences.

Members of staff are often the first to realise that there may be something seriously wrong within an organisation. They may, however, not express their concerns because they fear that speaking up would be disloyal to their colleagues or to Alliance Learning. 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.

This policy document makes it clear that staff may do so without fear of victimisation, subsequent discrimination, or disadvantage. This confidential reporting policy is intended to encourage and enable workers to raise serious concerns within Alliance Learning, rather than ignoring a problem or "blowing the whistle" outside of Alliance Learning. However, nothing in this policy should be seen to encourage the deliberate lodging of false, vexatious or malicious complaints. It will remain the policy of Alliance Learning to take appropriate action in such cases.

Complaints that counted as whistleblowing

* a criminal offence, e.g. fraud
* That the health and safety of any individual has been, is being, or is likely to be jeopardised
* risk or actual damage to the environment
* a miscarriage of justice has occurred, is occurring, or is likely to occur
* the company is breaking the law, e.g. doesn’t have the right insurance
* That a person has failed, is failing or is likely to fail to comply with a legal obligation to which she/he is subject
* That information intending to show any matter falling within the above categories has been, is being, or is likely to be deliberately concealed.

Complaints that don’t count as whistleblowing

* Personal grievances (eg bullying, harassment, discrimination) aren’t covered by whistleblowing law, unless your particular case is in the public interest.

Report these under Alliance Learning’s Grievance Policy

All subcontractors will be subject to strict due diligence to assess risk of delivery and all evidence of this will be stored on file.

The Public Interest Disclosure Act 1998

This policy is made in respect of The Public Interest Disclosure Act 1998 (widely referred to as the Whistleblowers' Act) (“the Act”) came into force in 1999. The Act is summarised below. The summary is not intended to be a full summary of all provisions of the Act.

The Act is intended to encourage workers to raise their concerns in a responsible way where there is a practice within an organisation which relates to any of the matters listed above.

If workers do raise such concerns, they will be protected from subsequent victimisation, unfair dismissal, redundancy and detriment as a result of making their protected disclosure, provided that their case falls within the detailed criteria in the Act. These criteria include that the discloser must reasonably believe the disclosure to be true.

The intention of the Act is that workers will have the right to raise their concerns internally. If a worker does not want to make a disclosure internally then they may make a disclosure to a legal adviser of their choice, various bodies prescribed for the purposes of the Act ( as shown on the attached link <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies> ) or Ministers of the Crown and still get the protections of the Act. Disclosures to other persons or organisations do not give the protections of the Act and may be viewed by the Alliance Learning as breach of contract or duty by the discloser.

This policy has also been written in line with guidance of the Bribery Act 2010 (gov.uk).

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