

## WHISTLE BLOWING POLICY STATEMENT AND GUIDELINES

Person responsible for ensuring that this policy is implemented and reviewed in line the review dates below: <b>Head of Programmes</b> <b>Quality Director</b> <b>Advisory Board</b> <b>Quality Improvement Team</b>	Job Role: <b>Head of Programmes</b>
Policy created: 26 July 2006 <b>Date of last review July 2023</b>	Next Review date: July 2024

### 1. INTRODUCTION

The Directors of MI ComputSolutions wishes to ensure that at all times the business of the company is conducted with probity. In recognition of this and having regard to the Public Interest Disclosure Act 1998, the Directors have approved the publication of this statement and guide, which is applicable to all staff and learners at MI ComputSolutions.

When someone connected with this organisation does something illegal or improper in connection with the business of this organisation, it is his/her colleagues who are often the first to know or suspect that something improper is or has been going on. There is, however, a natural reluctance for some people to voice their concerns, whether this is because of a feeling that there is insufficient evidence or from fears that such "whistleblowing" may have unforeseen and/or unfortunate repercussions.

The Directors will not condone any MI ComputSolutions business activity that is illegal or improper, whether this is done by any individual member of staff or learner, senior manager or any of its suppliers or contractors. The Board encourages staff and learners to report any suspected or actual illegal or improper activity.

### 2. DEFINITIONS

The definitions used in this policy are explained throughout the policy document.

### 3. SCOPE

It is impossible to provide an exhaustive list of the types of activities that might fall within the scope of this guidance, but it would certainly include acts of fraud, theft, endangering the health and safety of staff, learners and members of the public. It may also encompass acts which are damaging to the environment, deliberate failure to comply with legal obligations, and may also include instances of sexual impropriety. The rule of thumb is to report any suspicions of misconduct or malpractice connected with MI ComputSolutions business, in accordance with the paragraph below. Whilst the Managing Directors encourage such reporting, any instance of a report which is

made maliciously or for personal gain, will of itself be regarded as a misconduct in accordance with MI ComputSolutions disciplinary procedures.

#### **4. PURPOSE**

This policy reflects the organisations desire to operate an ethical business with appropriate probity. The policy provides a framework detailing responsibilities of staff and the process for reporting wrong-doing within the organisation.

The aim is to provide an environment where people reporting issues do so free from risk of discrimination or other forms of bullying harassment and harm.

#### **5. RELATED POLICIES**

Separate policies exist regarding discrimination, harassment or bullying. The policy works in association with the safeguarding policy, the Health and Safety policy, Environmental Policy, Data Protection policy, Malpractice and Fraud Policy.

This Policy also compliments the complaints procedures, the grievance procedure and the reporting a suspicion of misconduct/malpractice.

#### **6. PROCESSES**

##### **What sorts of things are covered by this guidance?**

The list of items that need reporting are wide ranging and complex but as an indication might include;

- Fraud or financial irregularities
- Theft or Arson
- Health and safety concerns such as dangerous practices
- Infringements of employee rights
- Bullying, harassment or discrimination
- Physical abuse
- Safeguarding and Prevent issues
- Environmental concerns
- Breaches of Data protection
- Criminal activity
- Failure to comply with Legal obligations

##### **Whom do I report to?**

This guidance does not supplant the established procedures such as the generic formal complaints procedures, the grievance procedure, or the policies on discrimination, harassment or bullying. Any notification preferably should be in writing, and for this purpose the formal complaints procedure forms may be used to initiate a report or suspicion of misconduct/malpractice. Such reports normally should be submitted to an appropriate Line Manager, but the Managing Director acknowledges that this may, in some instances, be considered inappropriate and, in these instances, the report may be sent direct to the Managing Director or another senior manager.

Upon receipt of such a report, the Managing Director in their absolute discretion shall decide the course of action to take and the form of response to you.

The Managing Director does not expect you to have absolute proof of any misconduct or malpractice, but does expect you to be able to show reasonable grounds for your suspicions, and to co-operate, where necessary, in any investigations which ensue.

### **How confidential is this process?**

MI ComputSolutions will endeavour to keep the identity of any reporter confidential, but this cannot be guaranteed. For example, if a criminal investigation ensues, you may be called as a witness in any proceedings. MI ComputSolutions will, however, seek to protect you from any subsequent victimisation.

### **How will the matter be investigated?**

Receipt of your report will be acknowledged as soon as possible and appropriate investigations will be undertaken. The nature of the investigations will depend upon the circumstances of the matter being reported upon and these may involve the police or other external agencies. You will be provided with feedback (so far as the law permits) upon completion of the investigation.

The Managing Director will undertake a periodic review of the effectiveness of these guidance notes and will welcome any suggestions for modification or improvement.

Arson will be subject to disciplinary action.