

# Whistle Blowing Policy

**[2025/26]**

## Public Interest Disclosure (Whistleblowing) Policy – Statement & Guidelines

### 1. INTRODUCTION

The Board of Directors of MISDC (the Organisation) 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 (as amended), the Directors have approved the publication of this statement and guide, which is applicable to all staff and learners at MISDC (the Organisation).

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 Board of Directors will not condone any MISDC (the Organisation) 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.

Key Principles:

- Concerns will be taken seriously and addressed promptly.
- Whistle-blowers will be protected from detriment, retaliation, or dismissal for making a disclosure in good faith.
- Anonymous disclosures will be considered, but providing contact details enables better follow-up.
- All disclosures will be handled in line with confidentiality obligations and relevant UK legislation.

### 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 MISDC (the Organisation) business, in accordance with the paragraph below. Whilst the Chief Executive Officer (CEO) – or designated Whistleblowing Officers 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 MISDC (the Organisation) disciplinary procedures.

### 4. PURPOSE

This policy reflects the organisations desire to operate an ethical business with appropriate probity. The policy provides a framework detailing responsibility of staff and the process for reporting wrongdoing 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, UK GDPR and Data Protection Act 2018 (Data Privacy Laws) 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 Duty issues
- Environmental concerns
- Breaches of Data protection
- Criminal activity
- Failure to comply with Legal obligations

How to Raise a Concern:

1. Wherever possible, raise your concern promptly after becoming aware of it.
2. Put your concern in writing to create a clear record – use the Whistleblowing Report Form if available.
3. Submit it to your Line Manager, the CEO, or an appointed Whistleblowing Officer. If the concern involves them, go directly to the Board Chair.
4. You may also seek confidential advice from Protect (formerly Public Concern at Work) at 020 3117 2520.

### **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 Chief Executive Officer (CEO)

– or designated Whistleblowing Officer acknowledges that this may, in some instances, be considered inappropriate and, in these instances, the report may be sent direct to the Chief Executive Officer (CEO) – or designated Whistleblowing Officer or another senior manager.

Upon receipt of such a report, the Chief Executive Officer (CEO) – or designated Whistleblowing Officer in their absolute discretion shall decide the course of action to take and the form of response to you.

The Chief Executive Officer (CEO) – or designated Whistleblowing Officer 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?**

MISDC (the Organisation) 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. MISDC (the Organisation) 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 Chief Executive Officer (CEO) – or designated Whistleblowing Officer will undertake a periodic review of the effectiveness of these guidance notes and will welcome any suggestions for modification or improvement.

All proven acts of serious misconduct, including arson, will result in disciplinary action up to and including dismissal, and may be referred to the police.