

WHISTLEBLOWING POLICY



Introduction

This Policy is founded on the principle that Three-Dimensional Training (3DT) and its employees ensure that their business and personal conduct is ethical and in line with the values and objectives of 3DT.

From time to time, a situation may arise where a member of staff has serious concerns about perceived irregularities in the running of 3DT or the activities of staff within 3DT which may be that they are unlawful, or against Company policies and/or established standards of practice. Such concerns might relate to, for example, financial malpractice, breach of trust, or departures from statutory or other requirements for good governance.

3DT is committed to a policy which minimises the risk of fraud and corruption in the organisation. It encourages the reporting of any information which might lead to the discovery of a fraudulent or corrupt practice but at the same time it wishes to reassure staff that they will be protected if, as part of the policy, they raise a concern in good faith. This policy aims to encourage and enable staff to raise serious concerns through avenues within the institution through approved channels rather than overlooking a problem or raising the issue outside the institution through unapproved channels. The Whistleblowing Policy reinforces existing procedures and clarifies and secures the position of employees.

This Policy is for use by staff employed by 3DT and all learners/employers involved in any activities.

Existing Controls within 3DT.

The Directors have overall responsibility for ensuring the Policies, Procedures, and ways of operating within the Company are free from fraud and corruption.

Existing procedures

Procedures exist to enable staff to work in an environment free from harassment and to raise grievances if they are not being treated correctly. The Whistleblowing policy has a wider application and is intended to cover any form of malpractice, including fraud, theft and corruption. Whistleblowing is not a substitute for 3DT Grievance Procedure and is not a channel for staff to raise grievances in relation to their conditions of service and personal circumstances. Staff are encouraged to raise with the Director any weaknesses in Company systems which could lead to abuse.

Acceptance of Gifts and Hospitality

It is important to distinguish between fraud and corruption. Both are serious matters, but fraud tends to be characterised by complicity. Corruption is often more difficult to prove. Accepting money or hospitality is the most obvious form of corruption in public life. Under no circumstances should a gift or concession of any sort be accepted where this could be construed as a reward for special or unwarranted favours. In the event of any doubt, the Quality Manager should be consulted regarding the acceptance of any gifts.

Safeguards

3DT recognises that a decision to “blow the whistle” can be a difficult one to make, not least because of the

fear of reprisal from those who may be guilty of the malpractice that is the source of the concern or from the organisation. 3DT will not tolerate any victimisation and will take every appropriate action to protect any person who raises a concern in good faith including any necessary disciplinary action. If a member of staff has a concern, they can seek information and guidance with anonymity from the personnel section.

3DT will strive to protect the identity of any member of staff who raises a concern anonymously and who does not want his/her name disclosed. However, this may not always be possible, as any investigation process may reveal the source of information and a statement by the whistleblower may be a necessary part of the evidence.

3DT will protect individuals from false, malicious, or vexatious expressions of concern. Disciplinary action may be taken against any member of staff who is discovered to have made allegations maliciously. In addition, 3DT will try and ensure that the negative impact of either a false or unfounded allegation on any “accused” person is minimised where possible. Such allegations will not be kept on the personal file of the “accused” person.

Concerns expressed anonymously will be considered at the discretion of 3DT, considering the seriousness and the credibility of the concern.

Procedure for Reporting Concerns

Concerns should normally be raised with the line manager of the member of staff, however, the most appropriate person to contact to report a concern will depend on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. Staff may therefore contact any of the following, who will be trained to deal with the procedure for handling concerns:

- a. their Line Manager
- b. one of the Directors

If a member of staff believes that the Senior Management of 3DT are involved in the issues that are a matter of concern, contact should be made with the Director.

Staff may contact their trade union or professional association to raise an issue on their behalf.

Whilst staff will not be expected to prove the truth of an allegation that is made, it will be necessary to demonstrate to the person contacted that there are reasonable grounds for concern.

Issues may be raised in person or in writing but the full extent of the allegations should be made clear.

Procedure for dealing with issues raised

It is important that all matters are handled in confidence and not discussed outside those directly involved as far as possible.

Concerns or allegations raised which fall within the scope of specific established procedures may be referred for consideration under those procedures. Concerns should not be brought under this procedure where 3DT already has guidelines/procedures in place to deal with the issue e.g. purchase of I.T. equipment.

A referral of a concern will be acknowledged by the person having received the concern, within five working days and an indication given of how 3DT proposes to deal with the issue within 10 working days of the initial concern.

As detailed a written record as possible of all salient points and dates should be kept by the person to whom the allegations were made.

Some concerns may be capable of resolution by agreed action without the need for investigation.

However, usually the matters raised will be investigated by management, by internal audit or through disciplinary procedures. Alternatively they may be subject to independent enquiry. Relevant matters may also be subject to investigation by police.

Therefore, any person who receives a concern should contact the Director so that an appropriate course of action can be agreed. If appropriate, initial enquiries would be made to assist in determining the most appropriate process for the consideration of the concern. Alternatively, a senior manager maybe requested to undertake further work to establish the facts or 3DT Internal Auditors may be asked to assist.

Due note must be taken of Company Disciplinary Procedures particularly where the matter might involve the suspension of a member of staff. The relevant sections of the disciplinary procedure would be used to determine whether a member of staff suspected of fraud or corruption would be suspended on full pay by the Director. The suspended person would be required to hand over items such as key, documents and Company property. The suspended individual will be denied access to Company premises.

In the early stages of the investigation, it is not an automatic requirement that the police are informed. The particular circumstances of the case will determine whether and at which stage the police are notified. The Director will be responsible for notifying the Police. It may be necessary for the Director to discuss the evidence with the Police informally initially. Where documents are handed over to the Police, the Director should ensure that the police sign for them. Circumstances will determine whether it is necessary to wait for the results of police enquiries before internal procedures are followed.

Regarding allegations where the Police are involved, 3DT will be guided by the Police as to when the person can be informed.

3DT will take appropriate steps to minimise any difficulties that a member of staff may experience because of using this procedure.

The person raising the concern will be given as much information as possible on the outcome of the investigation, subject to the constraints of 3DT duty of confidentiality or any other legal constraint.

The person against whom the concern is raised will be informed of the allegations as early as possible in the process. They will have the right to be represented by a trade union representative or work colleague.

Although it is difficult to be prescriptive about time scales it is in the best interests of all parties for any

investigations to be undertaken as speedily as possible.

Taking matters further

It is the intention of the policy that issues are raised within 3DT. However, if a member of staff is dissatisfied with the response provided by 3DT he/she could raise the issue with the Governors.

Members of staff should not disclose confidential, false, or misleading information to an unapproved external organisation. In considering taking a concern outside 3DT, staff should be aware of their duty of confidentiality and ensure that no confidential information is divulged.

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