

Whistleblowing Policy

Policy Aims

Key Definitions (as defined by The Department for Business Innovation and Skills):

“Whistleblowing” means; the term used when a worker passes on information concerning wrongdoing: “making a disclosure” or “blowing the whistle”. The wrongdoing will typically (although not necessarily) be something they have witnessed at work.

“Whistleblower” means: An individual who makes a Whistleblowing disclosure.

This Whistleblowing Policy provides a framework of protection for individuals who disclose information to expose risk, misconduct, malpractice, wrongdoing and matters of similar concern. In short it protects Whistleblowers from victimisation and dismissal.

Whistleblowing is viewed by ANTA Education Ltd as a positive act that can make a valuable contribution to ANTA Education Ltds business. It is important that our staff feel able to raise concerns. ANTA Education Ltd is committed to achieving the highest possible standards of service and the highest possible ethical standards in all of its' practices.

It is important to ANTA Education Ltd that individuals can raise concerns about wrongdoing or malpractice within our group of companies without fear of victimisation, subsequent discrimination or any form of disadvantage.

Therefore, this Policy aims to:

- encourage individuals to feel confident in raising serious concerns at the earliest opportunity and to question and act upon concerns about practice
- provide avenues for individuals to raise concerns and receive feedback on any action taken
- ensure that such individuals receive a response to their concerns and that they are made aware of how to pursue them if they are not satisfied
- reassure individuals that they will be protected from possible reprisals or victimisation if they have made any disclosure in good faith.

3.0 Principles of the Policy

This Policy is intended to enable those who become aware of such wrongdoing to report their concerns at the earliest opportunity so that they can be properly investigated.

The Whistleblowing Policy is not intended to replace existing procedures.

If your concern relates to an individual's own treatment as an employee, it should be raised under the relevant ANTA Education Ltd company grievance procedure.

If a client has a concern about services provided to him / her, it should be raised as a complaint via ANTA Education Ltd's published policy.

Any disclosure made by an individual in relation to this Whistleblowing Policy should be made under the process set out in Appendix 1.

A Whistleblower is protected by the law via the Public Interest Disclosure Act 1998 and the Republic of Ireland's Protected Disclosures Act 2014 provide protection for those who voice genuine and legitimate concerns. These Acts also provide protection for ANTA Education Ltd's employees and others against false, vexatious and malicious accusations. Any Whistleblower will not be treated unfairly or be disadvantaged in any way if they make a disclosure.

To be covered by the above Disclosure law(s), a worker who makes a disclosure must reasonably believe two things;

1. That they are acting in the public interest.
2. That a worker must reasonably believe that the disclosure tends to show past, present or likely future wrongdoing.

The categories of wrongdoing referenced above can include (but are not limited to):

- A criminal offence that has been committed or is likely to be committed
- Non-compliance with company policies which could result in loss to the company
- Undue favor being granted to another party with whom ANTA Education Ltd does business
- A failure to comply with legal / regulatory obligations
- A miscarriage of justice
- Actions which endanger health and safety

- Actions which could cause damage to the environment
- Actions which are fraudulent, corrupt or involve potential or suspected bribery (see Anti-Fraud, Bribery and Corruption Policy)
- Bullying of an individual or a bullying culture across a team (or across the organisation) which an individual feels unable to be raised through other channels
- Concerns about a member of staff's conduct towards vulnerable people (for example, a child or an adult with care and support needs), whilst carrying out their work
- Information that suggests an employee, sub-contractor, agency worker or volunteer is unsuitable to work with children or vulnerable adults
- Belief that senior managers and the designated safeguarding lead have failed to take appropriate action in response to safeguarding concerns
- An attempt to cover up any of the above

The procedure for making a disclosure / Whistleblowing is attached at Appendix 1 to this Policy

5.0 Responsibilities

All ANTA Education Ltd employees; Adherence to this policy and law

Line Managers; ensuring awareness and compliance of employees with this policy

Craig Howard, ANTA Education Ltd Managing Director takes full and final responsibility.

6.0 Policy Review

This policy will be reviewed on an annual basis except where there is a need for an additional review to incorporate a material change to the principles outlined. The document owner will hold responsibility for onward communication of any material amendment through the appropriate communication channels.

ANTA Education Ltd Managing Director will review and approve any revision to this policy.

Next Review Date	30th August 2021
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Appendix 1: Whistleblowing Process

1. Principles of Confidential Reporting

1.1 We know that it is never easy to report a concern, particularly one that may relate to fraud, bribery or corruption. However, it is of vital importance to our business that any individual can come forward with any concerns at an early stage and before problems have a chance to become serious. In certain parts of the business, an individual may also have a professional duty to report a concern.

1.2 An individual may invite a work colleague, or trade union representative, to be present during any meeting(s) or interviews in connection with the concerns raised.

1.3 We will support all employees who have a legitimate concern and protect them from reprisals or victimisation. If an individual comes forward with a concern, they can be confident that this will not affect their career or enjoyment of their job.

1.4 We will take all reasonable steps to respect and protect an individuals' confidentiality. Any individual can raise concerns anonymously. There may be instances where allegations are made relating to the conduct of an employee, sub-contractor, agency worker or volunteer, in connection with a child, young person or an adult with care and support needs, where it is assessed as necessary that ANTA Education Ltd notify the designated Safeguarding Officer of the allegations.

1.5 If anyone tries to discourage an individual from coming forward to express a legitimate concern, this will treat this as a disciplinary offence. Should anyone criticise or victimise an individual after a concern has been expressed, this will also be dealt with this under our disciplinary procedure.

2. Disclosure Process

2.1 Internal Disclosures

2.1.1 If a disclosure is to be made, the individual should, if appropriate, approach their line manager and explain what is causing their concern for the public interest. It is important that (when raising any such disclosure) that an individual should try to capture their concerns in as objective a manner as possible with clear examples of evidence so that the issue can be addressed as efficiently and effectively as possible. If you believe that your line manager or more senior members of staff are the subject of the disclosure, then 2.2 should be followed.

2.1.2 In the event that any disclosure by an individual relates to the line manager or senior members of staff, then the disclosure should be made to Managing Director Craig Howard

2.1.3 Whilst we would always encourage you to report any concerns internally in the first instance, in addition, or alternatively, in the UK you can also approach Public Concern at Work (PCaW), an independent organisation, for confidential and independent advice at: Public Concern at Work 3rd Floor, Bank Chambers 6 - 10 Borough High Street London SE1 9QQ. Telephone (general enquiries and helpline): 020 7404 6609 / whistle@pcaw.org.uk / www.pcaw.co.uk

There is no equivalent body in the Republic of Ireland.

2.2 External

Where a disclosure is received by an employee from an external source, details should be reported immediately to the Executive Director for Commercial and Corporate Governance and / or the Executive Director of the business to which the disclosure relates.

Any individual who makes a disclosure will be given feedback on the outcome of any investigation conducted, subject to the constraints of ANTA Education Ltd duty of confidentiality to service users and employees or any other legal constraints.