

## Whistleblowing Policy

### 1. POLICY STATEMENT

The Procurement Academy takes a very serious view of any fraudulent behaviour, serious malpractice and general abuse occurring in the work place, and encourages all employees to raise concerns. These will be treated seriously and addressed appropriately.

### 2. PEOPLE AFFECTED BY THIS POLICY

All employees and those who otherwise carry out work for or on behalf of The Procurement Academy, including Direct associates.

### 3. PROCEDURE (that all staff MUST follow)

#### 3.1 Principles

Every worker is responsible for ensuring bad practice does not happen in The Procurement Academy.

Only concerns raised which are made in the public interest and relate to the below list will be viewed as whistleblowing disclosures:

- A criminal offence or activity which has been, or is likely to be, committed. This could include neglect, abuse, theft, fraud, breach of data protection etc.
- The breach of a legal obligation.
- A potential, or actual, danger to the health and safety of any individual. This can include medical negligence, dangerous working environments etc.
- Activities which present a serious risk to the environment
- A miscarriage of justice.
- A deliberate attempt to conceal any of the above.

Whistleblowing disclosures will be made with the reasonable belief that they are genuine, therefore once a disclosure has been made this will be treated as serious and investigated. The individual, or individuals, who have blown the whistle will be protected and supported.

Concerns which do not constitute to a whistleblowing disclosure should also be treated as serious and appropriate action taken to address the concerns.

#### 3.2 What is a Whistleblower?

A whistleblower is someone who makes a disclosure which is in the public interest and relates to one or more of the list of disclosures within section 3.1. To qualify as disclosures the worker must raise their disclosure as highlighted within section 3.5 and 3.7.

All other concerns will be viewed as employees fulfilling their duty of care and raising a concern, as opposed to whistleblowing.

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In some instances, a worker may raise a whistleblowing disclosure under an alternative policy (e.g. grievance). Once it is apparent a protected disclosure has been made, even if the worker is unaware that the disclosure is protected, this will be covered by the Whistleblowing Policy. This means the worker is eligible for the support and protection given to all whistleblowers. If the worker is unaware their disclosure is protected they will be informed of this.

Whistleblowing will not be used when a worker is personally aggrieved or affected by an issue. This may include concerns regarding their terms and conditions or personal issues within their working life. These issues should be managed through either the Grievance Policy or complaints process depending upon a worker's employment status.

Where false allegations are raised maliciously, formal disciplinary action will be taken.

### 3.3 Raising a Concern

Concerns raised which do not fulfil the criteria listed in section 3.1 are not whistleblowing disclosures. However, it is important that any concerns are raised appropriately.

In the first instance and where appropriate, concerns should be raised informally with the individuals involved. For example, giving feedback to a colleague where poor practice is witnessed.

On occasion the worker may not feel able to challenge a colleague or believe their concern warrants escalation to a manager. Employees can report these concerns to either their line manager or another more senior manager. Workers who are not employees should initially raise concerns to an appropriate contact they have within The Procurement Academy.

### 3.4 Investigating a Concern

Concerns which are not covered by whistleblowing should still be given consideration as they can help improve the quality of service delivered by The Procurement Academy. Concerns raised will be dealt with as appropriate under the circumstances.

### 3.5 Raising a Whistleblowing Disclosure

Whistleblowing disclosures are serious and should always be reported. Employees should disclose these concerns to either their line manager or another more senior manager.

Once a disclosure is made the whistleblower should give as much detail as possible and, where possible, will be asked to provide their contact details. The disclosure will then either be investigated.

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### 3.6 Investigating a Whistleblowing Disclosure

All whistleblowing disclosures will be investigated. Once an investigation is completed the investigating manager will recommend appropriate action.

A disclosure made under the Whistleblowing Policy does not give the worker a right to know the outcome of any action taken, however where reasonable, appropriate feedback will be given.

### 3.7 Escalating a Whistleblowing Disclosure

Should a worker make a disclosure and it is not appropriately addressed, the disclosure should be escalated to a more senior manager.

If the whistleblower considers that their serious concern has still not been adequately addressed by The Procurement Academy, they may contact an appropriate external agency.

### 3.8 Protection of Whistleblowers

In line with the legal protection afforded by The Public Interest Disclosure Act 1988 and the Employment Rights Act 1996, workers will not suffer detriment as a result of whistleblowing. Additionally, using the protection of the Public Interest Disclosure Act (1998), whistleblowers can raise a concern formally and it will be investigated without their identity being disclosed.

Action will be taken to protect workers who blow the whistle from any detriment, recriminations or victimisation as a result of blowing the whistle. Any harassment or vexatious conduct by an employee towards an individual who has blown the whistle constitutes gross misconduct and will be investigated in line with the Disciplinary Policy.

### DOCUMENT CONTROL

VERSION	DATE OF ISSUE	DATE OF REVIEW	DATE OF NEXT REVIEW	SIGNATURE
4	August 2018	August 2025	August 2026	<i>Philip Chippindale</i>