

Whistleblowing Policy

Purpose of this Policy

Intelligencia Training is fully committed to operating to the highest standard and recognises that the business can only achieve this through the conduct of our employees and those working on behalf of Intelligencia. However, all organisations face risk of things going wrong from time to time, or unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do.

Aim of this Policy

The aim of this policy is to have a set of procedures which individuals feel comfortable enough to follow when raising a concern with Intelligencia and that this is taken seriously and investigated as appropriate.

The overall aim is to:

- Encourage staff to report suspected wrongdoing as soon as possible and that their confidentiality will be respected wherever possible.
- Provide staff with guidance as to how to raise a concern.
- Reassure staff that they should be able to raise a genuine concern without fear of repercussions, even if it turns out to be a mistake.

Scope of this Policy

This policy applies to all staff members working at different levels under a contract of employment on a substantive or fixed-term appointment with Intelligencia Training Limited.

Related documentation and Procedures

- Grievance Policy and Procedures
- Equality, Diversity and Inclusion Policy
- Whistleblowing Recording Log
- Code of Conduct Policy
- Data Protection Policy

Access to this Policy

This policy can be accessed electronically. A copy of this policy is made available to staff during induction and are always available on the company's intranet.

Definition of Whistleblowing

Whistleblowing is disclosure of information which relates to suspected wrongdoing or dangers at work, as defined by the Public Interest Disclosure Act 1998 (the "Act"). The Act specifies that any disclosure of information, which in the reasonable belief of the worker making the disclosure, tends to show one or more of the undernoted, is a protected disclosure under the Act:

- Criminal activity.
- Miscarriages of justice.
- Danger to health and safety.
- Damage to the environment.
- Failure to comply with any legal obligation.
- The deliberate concealment of any of the above matters.

A whistle-blower is a person who raises a genuine concern relating to any of the above. It is important to note that the Act only covers protected disclosure by workers. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy.



This Policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Policy and Procedure.

If you are uncertain whether something is within the scope of this Policy, you should seek advice from the Whistleblowing Officer – Hazel Lord (hazel@intelligenciatraining.com)

Roles and Responsibilities

The Managing Director has ultimate control of the policy. They will be updated on Whistleblowing concerns as part of bi- monthly board meetings or more frequently depending on the severity of a live investigation. Intelligencia has a nominated whistleblowing officer in situ, who will monitor, investigate and report on whistleblowing concerns. She will be supported by senior managers/ directors at operational level to support the investigative process.

Raising a Whistleblowing Concern and Reporting Processes.

1. In the first instance, any concerns should be reported to your line manager, either in person or in writing, if preferred. They may be able to agree a way of resolving your concern quickly and effectively.
2. However, where the matter is more serious or you feel that your line manager has not addressed your concern, or you would prefer not to raise it with them for any reason, you should contact the Whistleblowing Officer Hazel Lord- hazel@intelligenciatraining.com or mobile: 07506 236 229
3. Intelligencia Training appreciate the difficulties individuals may have in raising concerns initially. However, we want to provide reassurance that disclosures will be handled sensitively and with transparency. This can only be achieved through a culture built on openness and trust. The more information you can provide, the more successful we can be ascertaining whether the allegations are credible.
4. Where individuals are concerned about possible repercussions if their identity is revealed should come forward to the Whistleblowing Officer, who will put the appropriate measures into place to protect confidentiality.
5. Once you have raised a concern, it will be assessed to determine what initial action or further investigation should be taken. You will be told:
 - Who is handling the matter.
 - How you contact them.
 - Whether your further assistance will be needed.
 - If you request it, a written summary of your concern and how it will be handled will be provided including the timescales within which you should expect a response, if this is possible.
6. The person appointed to deal with your allegation will be responsible for making a decision at the earliest opportunity. They will confirm how they will progress with the allegation and ensure that this is appropriately communicated and documented. They will be required to log the disclosure on the whistleblowing log, which is monitored. A time frame for completing the initial investigation will be given. This may take up to 10 working days depending on the nature of the concern and number of people involved. However, this does need to be flexible in approach in order to reach the right decision. The whistle-blower will be kept up to date at all times.
7. Following the initial assessment, the Whistleblowing Officer may appoint a team/individual with relevant experience or specialist knowledge should further investigation be deemed necessary. You may be called upon to attend meetings to provide further information.
8. Whilst we cannot always guarantee the outcome you are seeking, Intelligencia Training, will try to deal with your concern fairly and in an appropriate way. The aim of this policy is to have an internal mechanism for reporting, investigating and rectifying any wrongdoing in the workplace. However, the law recognises that in some circumstances, it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely, (if ever) be appropriate to alert the media. We strongly encourage you to raise concerns before reporting a concern to anyone externally.

9. If individuals are not satisfied with how Intelligencia dealt with your concerns, or believe your concerns were not treated seriously and/ or the wrongdoing is still going on, there are referral agencies who can provide further guidance.

Advisory, Conciliation and Arbitration Services (ACAS) [Work and employment law advice | Acas](#)

Protect Advice Line: 020 3117 2520 or visit their website

[Protect - Speak up stop harm - Protect - Speak up stop harm \(protect-advice.org.uk\)](#)

Assurances

It is understandable that whistle-blowers are sometimes worried about repercussions. We aim to encourage openness and transparency and will support staff who raise genuine concerns under this Policy even if they turn out to be mistaken.

Staff should not suffer any detrimental treatment because of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer immediately. If the matter is not remedied, you should raise it formally using our Grievance Policy and Procedure.

However, if Intelligencia Training concludes that a whistle-blower has made false allegations maliciously, or with a view to personal gain, the whistle-blower will be subject to disciplinary action.

Data Protection

Any personal data processed under this policy will be processed in accordance with applicable data protection legislation and our Data Protection Policy.