

## Engage Education Whistleblowing Policy 2024

Engage Education is committed to conducting its business with honesty and integrity and aims to achieve the highest possible standards of service and ethical standards in all of its practices.

We expect all staff to maintain the same high standards too; however, all organisations face the risk of things going wrong and sometimes malpractice and wrongdoing can take place. We take malpractice and wrongdoing very seriously and aim to prevent and eliminate any wrongdoing or malpractice within the organisation.

We, therefore, encourage all staff to raise any concerns they may have about malpractice or wrongdoing within the organisation freely and without fear of suffering a detriment or dismissal to enable us to eliminate and prevent wrongdoing or malpractice within the organisation.

We will treat any concerns raised seriously and will protect and support any individual who discloses line with this policy.

### Qualifying Disclosures

This policy should be used to report concerns of malpractice or wrongdoing about our organisation's activities where you have information that you reasonably believe tends to show one or more of the following:

- That a criminal offence has been committed, is being committed or is likely to be committed
- That a person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject
- What miscarriage of justice has occurred, is occurring or is likely to occur; or
- That the health or safety of an individual has been or is being or is likely to be endangered; or
- That the environment has been, is being or is likely to be damaged; or
- That any of the above malpractices have been, are being or are likely to be deliberately concealed. This applies whether the malpractice has already occurred, is currently in progress, or is likely to happen in the future.

It doesn't matter if you are mistaken about your concern but you must have information that tends to show some malpractice or wrongdoing rather than an opinion or a feeling.

### Protected Disclosures

You will not qualify for protection under this policy if you commit an offence in making the disclosure, or if you disclose a matter that is subject to legal, professional privilege.

If your concern relates to your own treatment as an employee of Engage, including personal circumstances at work, you should raise it under our grievance procedure instead, unless you reasonably believe that the matter is in the public interest.

Any other concerns about our services generally that are not related to the types of wrongdoing or malpractice covered by this policy should be raised using our complaints policy instead.

## The Disclosure Procedure

This policy applies to all current and former employees, workers, officers, consultants, and contractors of our business, including home workers, trainees, apprentices, agency workers, casual workers and limited company contractors.

If you have any concerns about the types of malpractice or wrongdoing covered by this policy, you should in the first instance disclose your immediate superior. Agency workers should disclose concerns to the consultant who is responsible for managing their assignment.

If for any reason, you feel that you cannot tell your immediate superior, or in the case of an agency worker the consultant responsible for managing your assignment, you should raise the issue with the Head of HR.

If you have made a disclosure and are still concerned, or the matter is so serious that you feel you cannot discuss it with either of the two persons named above, you should raise the matter with a member of the board.

Disclosure of concern can be made by telephone, in person or in writing (including by email). However, the disclosure should be made in writing so that we can keep an exact record of your concern.

You can raise any concerns anonymously; however, we encourage you to give your name when reporting your concern wherever possible because it may be more difficult for us to protect your position or give you feedback on the outcome of investigations if you choose to remain anonymous.

You may wish to consider discussing your concern with a colleague before raising it formally under this policy. You can also choose to raise a concern under this policy alone or with a colleague; however, it is in the interests of all parties to maintain confidentiality once you have raised a formal concern.

You are not expected to prove the truth of your concern beyond a reasonable doubt or provide any evidence; however, you will generally need to provide the following information as a minimum:

The nature of the concern;

- Why you believe it to be true;
- The background and history of the concern; and
- Relevant dates where possible.

You can raise any concerns anonymously; however, we encourage you to give your name when reporting your concern wherever possible because it may be more difficult for us to protect your position or give you feedback on the outcome of investigations if you choose to remain anonymous.

## Our Response

We are committed to ensuring that all disclosures raised in accordance with this policy will be dealt with objectively, consistently, fairly and professionally.

We will take the time to listen to any issues raised and arrange a meeting as soon as possible to discuss your concern (unless the concern has been raised anonymously). The meeting will aim to establish the

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background and facts to help us decide whether and how to carry out any subsequent investigation. We may ask you for further information about the concern raised, either at this meeting or at a later stage.

You may bring a colleague or trade union representative to any meeting that takes place. The companion must respect the confidentiality of the disclosure and any subsequent investigation.

Any concerns you raise in line with this policy will be recorded on our internal HR system (Talent HR) confidentially.

After the meeting, we will decide how to respond. This will usually involve making internal enquiries in the first instance, but it may be necessary to investigate at a later stage which may be formal or informal depending on the nature of the concern raised. We will endeavour to complete investigations within a reasonable time.

We will keep you informed of the progress of the investigation as it is carried out and when it is completed, and give you an indication of the timescale for any actions or next steps that we may take. We cannot inform you of any matters that would breach any duty of confidentiality owed to others.

We will consider any concerns raised anonymously at our discretion, taking into account factors such as the seriousness of the issue raised, the credibility of the concern and the likelihood of confirming the allegation from other sources. However, concerns that are expressed completely anonymously are much less powerful and are difficult to investigate. It may also be difficult for us to provide you with feedback if you cannot be contacted.

If disciplinary or other proceedings follow the investigation, we may need to ask you to come forward as a witness to help us take appropriate action to end the wrongdoing.

## Key Contacts

Associate Director Human Resources - Liam D'Souza - [liam.dsouza@engagepartners.co.uk](mailto:liam.dsouza@engagepartners.co.uk)

Associate Director Compliance/Safeguarding - Joseph Raffell - [joseph.raffell@engagepartners.co.uk](mailto:joseph.raffell@engagepartners.co.uk)

Director of Education - David Evans - [david.evans@engagepartners.co.uk](mailto:david.evans@engagepartners.co.uk)