

THE HUB



EDUCATIONAL SERVICES

# **WHISTLEBLOWING POLICY**

**Date of Policy: April 2026**

**Date of Review: April 2027**

## **WHISTLEBLOWING POLICY AND PROCEDURE**

### **Introduction**

The Hub is committed to conducting its business with honesty and integrity and expects all staff to maintain high standards in accordance with their contractual obligations and The Hub's policies and procedures from time to time in force.

This policy reflects the organisations current practices and applies to every individual working for them irrespective of their status, level or grade. It therefore includes, the directors, employees, consultants, contractors, trainees, volunteers, home-workers, part-time or fixed-term employees, casual and agency staff (collectively referred to as "you" and "Staff" in this policy) who are advised to familiarise themselves with its content.

However, all organisations face the risk of things going wrong from time to time, or of 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 occur.

### **The Aim of this Policy**

The aims of this policy are to:

- encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected;
- provide staff with guidance as to how to raise those concerns;
- reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

This policy does not form part of any employee's contract of employment and is not intended to have contractual effect. It is provided for guidance to all members of staff at The Hub and we reserve the right to amend its content at any time.

### **What is Whistleblowing?**

Whistleblowing is the disclosure of information which relates to suspected malpractice, wrongdoing or dangers at work. This may include:

- criminal activity;
- child protection and/or safeguarding concerns;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;
- failure to comply with any legal or professional obligation or regulatory requirements;
- financial fraud or mismanagement and gift and hospitality (see Appendix H and I of Finance Policy and Procedures)
- negligence;

- breach of our internal policies and procedures including our Code of Conduct;
- conduct likely to damage The Hub's reputation;
- unauthorised disclosure of confidential information;
- the deliberate concealment of any of the above matters.

A whistleblower is a person who raises a genuine concern that they believe is in the public interest relating to any of the above. If you have any genuine concern related to suspected wrongdoing or danger affecting any of The Hub's activities (a whistleblowing concern) you should report it under this policy.

This policy should not be used for complaints relating to your own employment position or personal circumstances at work, such as the way you have been treated at work. In those cases, you should use the complaints procedure.

If you are uncertain whether something is within the scope of this policy you should seek advice from the Directors.

### **Confidentiality**

The Hub hopes that its staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise a concern confidentially, The Hub will endeavour to keep your identity secret in so far as it is possible to do so when following this policy and procedure. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you first. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of a disclosure without your help, so you may be asked to come forward as a witness. If you agree to this, you will be offered support.

Although a concern may be made anonymously, we encourage staff to put their name to their allegation whenever possible. Concerns that are expressed completely anonymously are much less powerful and proper investigation may be much more difficult or impossible. It is also much more difficult to establish whether any allegations are credible and to protect your position or to give feedback on the outcome of investigations.

The Hub will consider anonymous concerns at its 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.

Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to one of the contacts listed above and appropriate measures can then be taken to preserve confidentiality.

If you are in any doubt, you can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are:

Protect

Helpline: **020 3117 2520**

(Independent whistleblowing charity)

E-mail: [whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk)  
Website: [www.pcaw.org.uk](http://www.pcaw.org.uk)

## **Raising a Whistleblowing Concern**

The Hub hopes that in many cases, you will be able to raise any concerns with your Line Manager, speaking to them in person or putting the matter in writing if you prefer. Together, you may be able to agree a way of resolving the concern quickly and effectively.

Where your concern is regarding potential poor or unsafe practice or potential failures in the Hub's safeguarding regime, you should raise this initially with your line manager.

However, where the matter is more serious, or the Line Manager has not addressed the concern or you would prefer not to raise it with them for any reason, then you should contact one of the following:

- The Directors

It would be helpful if you can provide as a minimum the following information:

- the nature of the concern and why you believe it to be true; and
- the background and history of the concern (giving relevant dates where possible).

The Directors will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague [or trade union representative] to any meetings under this policy who must respect the confidentiality of the disclosure and any subsequent investigation. We may ask you for further information about the concern raised in this meeting or at a later stage.

The Directors will take down a written summary of the concern raised and provide you with a copy as soon as practicable after the meeting. It will also aim to give you an indication of how it proposes to deal with the matter.

## **Investigation and Outcome**

After the meeting, The Hub will carry out an initial assessment to determine the scope of any investigation required. The Hub will inform you of the outcome of this assessment. You may be required to attend additional meetings in order to provide further information of the concerns you have raised.

In some cases, The Hub may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter (this may include externally appointed persons). The investigator(s) may make recommendations for change to enable The Hub to minimise the risk of future wrongdoing.

The Hub will aim to keep you informed of the progress of the investigation and its likely timescale. It will endeavour to complete its investigation within a reasonable timeframe. However, sometimes the need for confidentiality may prevent them from giving specific details of the investigation or any disciplinary action or other action taken as a result. You are required to treat any information about the investigation as strictly confidential.

If the organisation concludes that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may (where they are an employee) be subject to disciplinary action under their Disciplinary Policy and Procedure.

### **If you are not Satisfied**

Whilst we cannot always guarantee the outcome you are seeking, we will try to deal with the concern fairly, professionally and in an appropriate way. If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts outlined above.

### **External Disclosures**

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. The Hub would expect that in almost all cases, raising the concern internally would be the most appropriate course of action and you should not find it necessary to alert anyone externally.

However, if for whatever reason, you feel you cannot raise your concern internally and you reasonably believe the information and any allegations are substantially true, the law recognises that in some circumstances it may be appropriate for you to report your concern to another prescribed person, such as a regulator or professional body. It will very rarely, if ever, be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone externally. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed people and bodies for reporting certain types of concern (see "Further Information" below).

Where your concern is regarding safeguarding practices within The Hub, and you feel unable to raise it internally or have concerns about the way your concern is being handled by The Hub, you can contact the NSPCC whistleblowing advice line on 0800 028 0285 – 8:00 AM to 8:00 PM, Monday to Friday or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk). Alternatively, you can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH.

Whistleblowing concerns usually relate to the conduct of Staff, but they may sometimes relate to the actions of a third party, such as a service provider. In some circumstances, the law will protect you if you raise the matter with the third party. However, you are encouraged to report such concerns internally first. You should contact one of the other individuals set out above for guidance.

## **Protection and Support for Whistleblowers**

It is understandable that whistleblowers are sometimes worried about possible repercussions. The Hub is committed to good practice and high standards. It aims to encourage openness and will support Staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

Staff must not suffer any detrimental treatment as a result 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 Proprietor immediately. If the matter is not remedied to your satisfaction, you should raise it formally using the complaints Procedure.

No member of staff must threaten or retaliate against an individual who has raised a concern in any way. The Hub will not tolerate any such harassment or victimisation and anyone involved in such conduct will be subject to disciplinary action.

However, to ensure the protection of all our staff, those who raise a concern frivolously, maliciously and/or for personal gain and/or make an allegation they do not reasonably believe to be true and/or made in the public interest will also be liable to disciplinary action.

## **DISCIPLINARY PROCEDURES**

### **Introduction**

We have developed our disciplinary procedures in order to provide clear and transparent structures for dealing with difficulties which may arise as part of the working relationship and to ensure that such difficulties are dealt with in a fair and equitable manner.

We would hope to informally resolve potential disciplinary issues. However, where an issue cannot be resolved informally, then there is often no option other than to follow a formal process. This sets out the basic requirements of fairness that will be applicable in most cases. We regard disciplinary action as a corrective measure to foster an improvement in the conduct or attitude of the employee concerned and not as a punishment. Disciplinary procedures are necessary to let all of our employees know what is expected of them in terms of standards of performance or conduct (and the likely consequences of continued failure to meet these standards) and to enable management and employees to determine suitable goals and timescales for improvement in an individual's performance or conduct. The following procedures do not form part of your contract of employment.

### **The Process**

There will normally be a full investigation of the facts before a decision to take any disciplinary action is invoked. Dependent upon the circumstances, we may hold an independent investigation meeting to determine if a formal disciplinary hearing is necessary. At all stages of the process, we will ensure that matters are kept confidential and expect you to do the same.

If we feel that it is necessary to take disciplinary action, we will notify you in writing of our concerns.

Where relevant, we will supply you with details of any evidence we will be using in the disciplinary hearing. You will be given a reasonable amount of notice to attend the meeting and to arrange for another member of staff or a Trade Union Official to accompany you.

If we regard an offence as potential Gross Misconduct, we may suspend you on your

normal contractual pay for the duration of the process. This period will be kept as short as is reasonably practical to investigate the matter, hold any necessary disciplinary hearing and consider the outcome.

At the meeting, we will outline our concerns and you will be given ample opportunity to explain your version of the situation and also to bring any supporting evidence to our attention. You may also ask witnesses to deliver their version of events to support you if you so wish. We will listen to what you say and will consider all points you put forward before reaching a decision on whether any disciplinary sanction is to be imposed. No decision will be made regarding any disciplinary action before we have had time to consider the discussion and any evidence produced at the meeting.

#### Outcome of the Meeting/s

After the meeting has concluded we will take time to consider all the evidence, and we will take one of the options listed below:

##### 1. No Action

If we feel that there is no case to answer, or there is insufficient evidence to support any action, or if we feel that you were genuinely unclear about what was expected from you and you agree to take remedial action, we may decide it is appropriate to take no further action.

##### 2. Warning

If we feel that you have not presented a valid reason or supporting evidence for the misconduct, we will issue you with a formal warning. Dependent upon the circumstances, this could either be a formal verbal warning, a written warning, or a final written warning.

Except for cases of Gross Misconduct or a short period of service, we will not normally proceed to dismissal for a first offence.

##### 3. Dismissal

If you are in receipt of prior warnings, we may decide to terminate your employment with us, giving you your contractual notice. If your misconduct is determined to be Gross Misconduct, then you will be summarily dismissed, (without any notice or pay in lieu of notice), irrelevant of whether or not you have had any previous warnings.

##### 4. Demotion

If you are in a supervisory or managerial position, we may decide to demote you, except in the case of Gross Misconduct.

#### Notification of Outcome of the Disciplinary Meeting

We will notify you, in writing as soon as we have considered the evidence and have reached a decision. The timescale will depend upon the complexity of the situation however, this will normally be no more than seven calendar days after the meeting has taken place, unless there is good reason why this cannot be so. The letter will outline our reasons for the decision made and, where disciplinary action is taken, the level or nature of the sanction imposed. It will also name the person to whom you should address an appeal should you wish to do so.

#### Right to be Accompanied

You have the right to be accompanied by a fellow employee of your choice, or by a Trade Union Official at all stages of the formal disciplinary procedures and at any subsequent appeal meetings. It is your responsibility to arrange for the appropriate person of your choice to be informed of the matter

and the dates of the hearing/s. If you wish a member of staff to accompany you, then either yourself or the person concerned, should notify us as early as possible, so that we can ensure that they can be released from their duties at the appropriate times.

We wholeheartedly support the right to be accompanied and any person who agrees to accompany a member of staff at any disciplinary or appeal hearing, will not be subject to any form of detriment as a result of doing so.

#### Record-Keeping

We will take notes of all meetings held and these, along with any supporting evidence used in the investigation and meetings will be held on your personnel file. Details of any disciplinary action taken will also be kept.

#### Administration of Disciplinary Warnings

Warnings will normally be issued in line with the following guidelines; however, this is not prescriptive. When deciding the level of action to be taken, we will take account of any mitigating factors, including your length of service and may vary the process or the administration of warnings accordingly. Dependent upon your length of service, you may be dismissed without any previous warnings.

#### **Further Information**

Protect (formerly known as Public Concern at Work) is a source of further information and advice at [protect-advice.org.uk](http://protect-advice.org.uk). Protect provides free, confidential whistleblowing advice, and can be contacted online via its website: [protect-advice.org.uk/contact-protect-advice-line](http://protect-advice.org.uk/contact-protect-advice-line) or by telephone on 020 3117 2520.

All Staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Proprietor in the first instance.