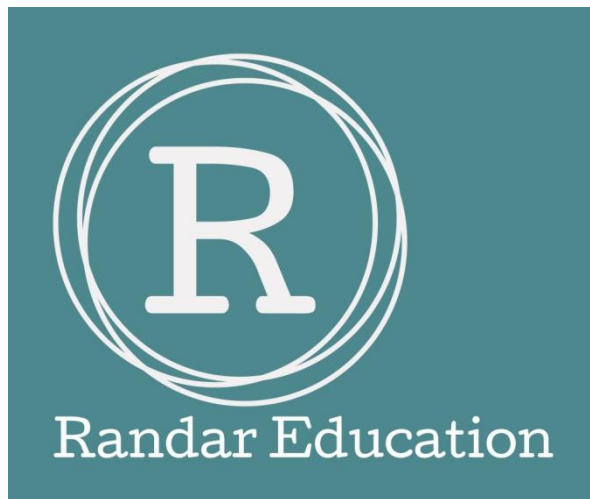




Randar Education

Whistleblowing Policy

Policy Date

1st April 2024

Review Date

1st April 2027

REVIEW SHEET

Each entry in the table below summarises the changes to this policy and procedures made since the last review (if any).

Version Number	Version Description	Date of Revision
1	Original	1 April 2024
2	More concise language	May 2026

Introduction

Randar Education is committed to the highest standard of openness, probity and accountability.

An important aspect of accountability and transparency is a mechanism to enable staff and other members of Randar to voice concerns in a responsible and effective manner. It is a fundamental term of every contract of employment that an employee will faithfully serve his or her employer and not disclose confidential information about the employer's affairs. Nevertheless, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organisation then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of Randar management (although in relatively minor instances the Head teacher/Operations manager would be the appropriate person to be told).

The Public Interest Disclosure Act, which came into effect in 1998 gives legal protection to employees against being dismissed or penalised by their employers because of publicly disclosing certain serious concerns. Randar has endorsed the provisions set out below to ensure that no members of staff should feel a disadvantage in raising legitimate concerns.

It should be empathised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial, or business decisions taken by Randar nor should be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures. Once the whistleblowing procedures are in place, it is reasonable to expect staff to use them rather than air their complaints outside of the company.

Scope of the Policy

This policy is designed to enable employees of Randar to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety. This policy is intended to cover concerns which are in the public interest and may, at least initially, be investigated separately but might then lead to the innovation of other procedures e.g. disciplinary. These concerns should include:

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or statutes
- Dangers to health and safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Attempts to conceal any of these

Safeguards

Protection

This policy is designed to offer protection to those employees of Randar who disclose such concerns provided the disclosure is made:

- In good faith
- In a reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person (see below). It is important to note that no protection from internal disciplinary

Confidentiality

Randar will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

Anonymous Allegations

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of Randar.

In exercising this discretion, the factors to be considered will include:

- The seriousness of the issue raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources

Untrue Allegations

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however an individual makes malicious or vexatious allegation, and particularly if she or he persists with them, disciplinary action may be taken against that individual.

Investigating Procedure

The investigating officer should follow these steps:

- Full details and clarifications of the complaint should be obtained.
- The investigating officer should inform the member of staff against whom the complaint is made as soon as is practically possible. The member of staff will be informed of their right to be accompanied by a trade union or other representative at any future interview or hearing held under the provision of these procedures.

- The investigating officer should consider the involvement of the company head of centre and police at this stage.
- The allegations should be fully investigated by the investigating officer with the assistance where appropriate, of other individual/bodies.
- A judgement concerning the complaint and validity of the complaint will be made by the investigating officer. This judgement will be detailed in a written report containing the findings of the investigations and reasons for judgement. This report will be passed to the directors.
- If a complaint is shown to be justified, then they will invoke the disciplinary or other appropriate company procedures.
- The complainant should be kept informed of the progress of the investigation and, if appropriate, of the outcome.

If the complainant is not satisfied that their concern is being properly dealt with by the investigating officer, they have the right to raise it in confidence with the head of centre. If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcome of the investigation, the company recognises the lawful rights of employees and ex-employees to make disclosures to prescribed person's (such as health and safety executive, the audit commission, or utility regulations), or where justified elsewhere.