

# **Whistleblowing Policy**

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## **Policy and Procedures**

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**bbodance 2022-23**

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## WHISTLEBLOWING POLICY

### Introduction

All organisations face the risk of things going wrong or of unknowingly harbouring malpractice. bbodance believes it has a duty to identify such situations and take the appropriate measures to remedy them. By encouraging a culture of openness within our organisation, bbodance believes it can help prevent malpractice. Furthermore, by knowing about malpractice at an early stage bbodance stands a good chance of taking the necessary steps to safeguard the interests of all staff and protect the organisation. In short, bbodance encourages you to 'blow the whistle' on suspected malpractice.

Please be aware that this policy is not the procedure for general grievances. If you have a complaint about your own personal circumstances then you should use the bbodance Grievance Policy.

If you have a complaint about an issue with a regulated qualification then you should refer to the bbodance Malpractice and Maladministration Policy.

If you have concerns about malpractice within the Company you should use the procedure outlined in this policy.

### Suspected malpractice

bbodance encourages you to report suspected malpractice in relation to our activities. We construe malpractice widely and this includes:

- Any illegal activity at the organisation;
- Any activity that causes the organisation to breach its legal obligations;
- Any activity that causes the organisation to endanger the health and safety of any person;
- Any activity that damages the environment;
- Any attempt to wilfully conceal any information that tends to show malpractice.

You are not required to obtain evidence of malpractice before raising your concern. As such you must not commit an act or acts of misconduct, breach organisation rules or damage the organisation in any way in order to obtain information. The organisation is committed to ensuring that it operates in an environment in which anyone can raise concerns and there is no question of you having to prove anything. The organisation will support anyone, who with the reasonable belief that it is in the public interest to do so raise concerns under this policy, even if they turn out to be mistaken.

### How to raise your concern internally

If you feel able to do so you should tell a senior member of the bbodance team about your concern. There is no special procedure for doing this - you can tell them about the problem, or put it in writing if you prefer. If you feel you cannot tell your usual contact, for whatever reason, please raise the issue with the Regulatory and Quality Assurance Advisor. If you have raised your concerns and you are still concerned, or the matter is so serious that you feel you cannot discuss it with the person named above, you should raise the matter with the CEO - Operations:

Name:	Fiona Knower
Contact telephone number: (email available on request)	020 8748 1241

### **How the Company will respond**

After you have raised your concern the organisation will decide how to respond in a responsible and appropriate manner under this policy. Usually, this will involve making internal enquiries first, but it may be necessary to carry out an investigation at a later stage, which may be formal or informal depending on the nature of the concern raised.

As far as possible, the organisation will keep you informed of the decisions taken and the outcome of any enquiries and investigations carried out. However, the organisation will not be able to inform you of any matters that would infringe the duty of confidentiality owed to others. If you ask for a matter to be treated in confidence the organisation will respect your request and only make disclosures with your consent.

### **Raising your concern externally (exceptional cases)**

The main purpose of this policy is to give you the opportunity and protection you need to raise your concerns internally. The organisation would expect that in almost all cases raising concerns internally would be the most appropriate action for you to take. However, if you feel you cannot raise your concerns internally and you honestly and reasonably believe the information and any allegations are true, you should consider raising the matter with an appropriate 'prescribed person'. The identity of the appropriate prescribed person will depend on the nature of your concern. However, they must be one of those prescribed by an order made by the Secretary of State for the purposes of the Employment Rights Act 1996 Section 43F. The Public Interest Disclosure (Prescribed Persons) Order 1999 (as amended) lists the prescribed persons.

If you have good reasons for not using the internal disclosure procedures or the disclosure procedure described above, you may consider making wider disclosure by reporting the matter to the police or to the media, for example. However, whistleblowers that make wider disclosures of this type will only be protected in certain circumstances. The organisation recommends that you take legal advice before following this course of action since we believe it will be in your own interests to do so.

### **Protection for whistleblowers**

You may be worried that by reporting your concerns you will be opening yourself up to victimisation or detriment, or risk damaging your relationship with the organisation. However, everyone benefits from statutory protection if they raise concerns in the right way and do so with the reasonable belief that raising the concern is in the public interest. This protection means that people must not be dismissed or suffer any detrimental treatment as a result of raising a concern. As it will be in your own interests to do so we would encourage you in particular to ensure you have a reasonable belief that the disclosure you wish to make is in the public interest as this is one of the requirements that must be met in order to obtain the statutory protection mentioned earlier.

Staff must not threaten or retaliate against whistleblowers in any way. This will be regarded as gross misconduct and may result in those involved being dismissed without notice or payment in lieu of notice. If you believe that you have suffered any detrimental treatment, you should inform the CEO - Operations immediately. If the matter is not remedied you should raise it formally using the bbodance Grievance Policy.