

POLICY



Whistleblowing Policy

VERSION CONTROL

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Author	Rachel Tallentire
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Policy Purpose

This policy sets out Orangebox's commitment to providing staff, learners, and stakeholders with a genuine platform for raising any issues regarding how the business is operated. This is particularly important as Orangebox delivers a range of services that are funded through public money. As a result, any genuine concerns should be shared immediately and will be dealt with quickly and effectively, adhering to the relevant processes and guidelines.

Policy statement

Orangebox encourages a free and open culture in its dealings between its learners, employees, and all people with whom it engages in business and legal relations. Additionally, Orangebox recognises that effective and honest communication is essential if concerns about breaches or failures are to be effectively dealt with and the organisational success ensured.

This policy is designed to provide guidance to all those who work with or within the organisation who may from time to time feel that they need to raise certain issues relating to the organisation with someone in confidence.

Procedure

This policy will apply in cases where employees genuinely and in good faith believe that one of the following sets of circumstances is occurring, has occurred or may occur within the organisation that:

- a criminal offence has been committed, is being committed or is likely to be committed
- a person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject
- a miscarriage of justice has occurred, is occurring or is likely to occur
- the health and safety of any individual has been, is being or is likely to be endangered
- the environment has been, is being or is likely to be damaged

- information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.

It is not necessary that employees prove the breach or failure that they are alleging has occurred or is likely to occur but may simply raise a reasonable suspicion. However, they should note that they will not be protected from the consequences of making such a disclosure if, by doing so, they commit a criminal offence or if they make the disclosure motivated by a reason which is not in good faith.

If employees wish to raise or discuss any issues which might fall into the above category, they should contact the Orangebox's HR lead or, in his or her absence or in any other circumstances a director or the CEO, who will treat the matter in confidence. In such cases it is likely that further investigation will be necessary, and employees may be required to attend a disciplinary or investigative hearing as a witness. Appropriate steps will be taken to ensure that their working environment and/or working relationship is/are not prejudiced by the fact of the disclosure.

If employees reasonably believe that the relevant failure (i.e., one of the set of circumstances listed above under clause (1) relates wholly or mainly to the conduct of a person other than their employer or any other matter for which a person other than the organisation has legal responsibility, then they should make that disclosure to that other person.

Also, employees may make such a disclosure to Public Concern at Work, the leading authority on public interest whistleblowing, if they consider that it has an interest in the matter and, despite the best efforts of the organisation, employees believe that disclosure within the organisation is inappropriate or has been unsuccessful. Disclosures made to employees' legal advisors while obtaining legal advice will be protected.

Employees should be aware that the policy will apply where a disclosure is made in good faith and where they reasonably believe that the information disclosed, and any allegation

contained in it, are substantially true. If any disclosure is made in bad faith (for instance, in order to cause disruption within the organisation), or concerns information which employees do not substantially believe is true, or indeed if the disclosure is made for personal gain, then such a disclosure will constitute a disciplinary offence for the purposes of the organisation's Employment Policy may constitute gross misconduct for which summary dismissal is the sanction.

While Orangebox hopes that such disclosures will never be necessary within its organisation, it also recognises that it may find itself in circumstances which are new to it. Each case will be treated on its own facts.

Policy review

The review, updating and circulation of this policy is the responsibility of Orangebox's HR lead and the senior manager accountable for the policy is the Director of Development & Innovation.

Version Change Log

Provide a brief synopsis of changes made to this policy and any document changes, named staff or references to other materials.

Date	Change made	Changed by	Reason