



Purple Ruler Whistleblowing Policy

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Introduction

Purpose: This policy aims to provide a framework for reporting concerns regarding illegal or unethical practices within our organisation. It ensures that all employees, contractors, and stakeholders can report their concerns without fear of retaliation.

Scope: This policy applies to all employees, contractors, and stakeholders involved in our organisation. It covers the reporting of any suspected wrongdoing or malpractice that may affect any aspect of our work.

Commitment: We are committed to protecting and supporting whistleblowers. We assure all personnel that any disclosure will be treated confidentially and seriously, and that appropriate action will be taken.

Policy Statement

Ethics and Integrity: Our organisation is committed to maintaining high standards of integrity and ethical behaviour. We encourage an open culture where employees feel able to raise concerns about wrongdoing.

Zero Tolerance: We have a zero-tolerance approach to retaliation against whistleblowers. Any form of retaliation, harassment, or victimisation of individuals who raise concerns will not be tolerated and will be subject to disciplinary action.

Definitions

Whistleblowing is the act of reporting concerns or information that an individual believes shows wrongdoing, malpractice, or unethical behaviour within the organisation.

Wrongdoing includes, but is not limited to:

- **Fraud or Financial Irregularities:** Any form of deception or dishonesty, including falsifying records, misappropriation of funds, or financial misreporting.
- **Corruption or Bribery:** Offering, giving, receiving, or soliciting something of value as a means to influence the actions of an official or other person in discharge of a public or legal duty.
- **Health and Safety Violations:** Breaches of health and safety regulations or practices that could endanger individuals or the environment.
- **Abuse or Mistreatment:** Physical, emotional, or psychological harm, including bullying and harassment, inflicted on any stakeholder, whether it be staff, students, or other related parties.
- **Criminal Activity:** Any illegal act, including theft, drug use or distribution, violence, or any other criminal behaviour.
- **Environmental Damage:** Actions that cause significant harm to the environment, such as pollution, waste mismanagement, or unlawful exploitation of resources.
- **Breach of Legal Obligations:** Failing to comply with statutory or regulatory requirements, or any legal obligations relevant to the organisation's operations.
- **Unethical Conduct:** Actions that, while not necessarily illegal, are unethical and against the organisation's code of conduct, including conflicts of interest, nepotism, and discrimination.

- **Covering Up Wrongdoing:** Any attempt to conceal, obfuscate, or misrepresent information related to any of the above issues.

Legislative Framework

Public Interest Disclosure Act 1998: Provides legal protection for employees who disclose information in the public interest. It protects whistleblowers from unfair dismissal and detrimental treatment.

Equality Act 2010: Ensures that whistleblowers are not discriminated against on the grounds of protected characteristics such as age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

Education (Independent School Standards) Regulations 2014: Requires compliance with educational standards, including the requirement to have proper procedures for handling complaints and whistleblowing reports.

Prevent Duty Guidance: Ensures reporting mechanisms align with the Prevent Duty requirements to safeguard children and young people from the risk of radicalisation.

Reporting Procedures

Internal Reporting

Line Manager: In most instances, concerns should be raised with the employee's line manager. However, it is important that the concern is raised with the person best placed to deal with the matter and with whom the employee feels most comfortable.

Designated Officer: There may be certain rare occasions when it would be inappropriate to raise the concern with the line manager because, for example, the concern may implicate the manager in some way, is about a senior manager within the line management chain or somewhere else in the department, or is particularly serious and needs to be dealt with as a matter of urgency. In such cases, concerns should be raised with the HR Director.

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External Reporting

Third Party Mediator: If the whistleblower is not satisfied with how their concerns are dealt with, they can contact our investor - ADM Computer Services. They have over 40 years of reputation to uphold and is ISO 2001 certified.

Regulatory Bodies: If an employee feels unable to report their concern internally, they can report it to relevant external regulatory bodies such as Ofsted, or seek legal advice. A list of prescribed bodies for whistleblowing can be found on the government's website: [List of Prescribed Bodies for Whistleblowing](#).

Raising a Concern

1. Concerns can be raised through various channels, including via Lark messages, via email, or through a dedicated whistleblowing hotline listed in the Prescribed Bodies link above.
2. The whistleblower can also use this form to report a concern directly to the Directors if they do not wish to use email.
3. When raising a concern, employees should provide as much detail as possible, including the nature of the wrongdoing, dates, locations, involved parties, and any supporting evidence. This information will help in conducting a thorough investigation.

Documentation and Record Keeping

All concerns raised and resulting investigations are stored securely on our digital workplace. This documentation is restricted to only the Directors.

Handling Reports

1. Upon receiving a whistleblowing report, the recipient will promptly acknowledge receipt of the concern. This acknowledgment will include an outline of the process that will be followed and an estimated timeframe for the investigation.
2. If the initial recipient is not a Director, the member of staff must complete a [Whistleblowing report form](#) to notify the Directors of this concern.
3. All investigations will be carried out by the HR Director, if necessary, will involve other Directors.
4. An initial assessment will be conducted to determine the seriousness of the concern and whether it should be handled under this whistleblowing policy or another appropriate procedure.

- a. The HR Director may request to speak with the whistleblower to obtain more details and information. This may take place via writing, voice call or video call depending on the willingness of the whistleblower. The HR Director may involve the initial recipient.
5. All investigations will be conducted sensitively, as quickly as possible, and in accordance with this procedure. The investigation should be concluded within three months of the matter being raised, although some scenarios may result in a longer timeframe. The investigation may involve meetings with the whistleblower to gather further information and clarify details.
6. The investigation process will maintain confidentiality to the fullest extent possible. The identity of the whistleblower will be protected unless disclosure is required by law or is necessary for a fair investigation. In such cases, the whistleblower will be informed before their identity is disclosed.
7. Once the investigation is complete, the whistleblower will be informed of the outcome and any actions taken as a result of their disclosure. If the concern was found to be unsubstantiated, this will be communicated along with the reasons why.

Confidentiality

Ensuring the confidentiality of whistleblowers is a priority for our organisation. We are committed to protecting the identity of individuals who report concerns, to the fullest extent possible. All reports will be handled with the utmost discretion, and information will only be disclosed on a need-to-know basis. This includes:

During Investigation: The identity of the whistleblower will be kept confidential during the investigation process unless the whistleblower consents to disclosure, or disclosure is necessary to facilitate a fair investigation. If there is a need to disclose the whistleblower's identity, this will be discussed with the whistleblower beforehand, and they will be informed of the reasons why.

Documentation: All records of whistleblowing reports, investigations, and outcomes will be stored securely and access will be restricted to the Directors only. The identity of the whistleblower will not be included in the documentation unless it is necessary for the investigation.

After Investigation: Even after the investigation is concluded, the confidentiality of the whistleblower will be maintained. Information regarding the whistleblower's identity will not be disclosed unless required by law.

Anonymity

Whistleblowers have the option to report their concerns anonymously. While anonymity can provide an additional layer of protection, it can also limit the ability to investigate the concern thoroughly. To ensure a comprehensive investigation, we encourage whistleblowers to identify themselves and provide their contact information. However, if a whistleblower chooses to remain anonymous, the following will apply:

1. We will accept and investigate anonymous reports to the extent that it is possible to do so. The same process will be followed as with non-anonymous reports, although the ability to clarify details and gather additional information may be limited.
2. It is important for whistleblowers to understand that anonymity can hinder communication during the investigation process. If further information is needed and the whistleblower cannot be contacted, it may impact the outcome of the investigation.

Support and Guidance

Advice and Guidance: Employees are encouraged to seek advice from their line manager, the designated whistleblowing officer, or external bodies such as legal advisers or prescribed regulatory bodies. This can help them understand the process, their rights, and the protections available to them.

Protection of Whistleblowers: Whistleblowing law prevents employees from being treated unfairly or dismissed for reporting wrongdoing in the public interest. Retaliation against whistleblowers is strictly prohibited, and any instances of retaliation will be dealt with severely.

Support for Whistleblowers: We encourage any employee considering whistleblowing to read the guidelines from the government carefully before acting on their decision. Employees are also encouraged to seek advice from their line manager or the designated officer if they are unsure whether their concern qualifies as whistleblowing. If it is determined that the concern is more appropriately addressed through the company's grievance procedures, employees should follow the procedures outlined in the employee handbook.

Protection Against Retaliation

Anti-Retaliation Commitment:

Our organisation is committed to protecting whistleblowers from any form of retaliation, harassment, or victimisation. Retaliation against individuals who report concerns in good faith is strictly prohibited and will be treated as a serious disciplinary offence. This includes:

1. Employees who report concerns will be protected from adverse actions such as dismissal, disciplinary action, demotion, loss of benefits, threats, or any other form of retaliation.
2. Any employee who believes they have been subjected to retaliation as a result of whistleblowing should report this immediately to the HR Director. The organisation will take swift action to investigate and address any instances of retaliation.

Reporting Retaliation:

1. If an employee experiences or witnesses retaliation, they should report it immediately through the same channels as outlined above.
2. This will be investigated immediately and any confirmed efforts of retaliation are subject to disciplinary procedures outlined in the employee handbook.

Training and Awareness

- All employees will be introduced and trained on the whistleblowing policy in the initial training programme, including how to raise concerns, the protections available, and the process that will be followed after a report is made. This training will ensure that employees are fully aware of their rights and responsibilities under the whistleblowing policy.
- Managers and supervisors will have had to complete additional [Whistleblowing Training](#) on how to handle whistleblowing reports, conduct investigations, and support whistleblowers. This training will include best practices for maintaining confidentiality, conducting fair investigations, and preventing retaliation.
- All employees will undergo an annual refresher course on this policy to ensure they are updated on any amended details.

Monitoring Effectiveness

- All whistleblowing reports will be logged and tracked to monitor the number and types of concerns raised. This data will be analysed to identify trends and areas where further action or training may be needed.
- The outcomes of all investigations will be reviewed to ensure that they are conducted fairly and consistently. This review will help to identify any potential gaps or weaknesses in the investigation process.

- Employee surveys will be conducted to gauge awareness of the whistleblowing policy and confidence in the reporting process. The results of these surveys will be used to make any necessary adjustments to the policy and training programs.
- The above information will inform the annual review of this policy.