



K N & P Limited

Whistleblowing Policy

Policy agreed (date):	01.08.24
Policy published (including on website) (date):	01.08.24
Next review (date):	01.08.25
Policy reviewed by:	Kayley Butler – Director & Business Manager

Key Personnel

Role	Name	Tel.	Email
Proprietors	Philippa Bourne Kayley Butler Natalie Bourne	07716883051	Admin@knp-limited.com
Designated Safeguarding Lead	Philippa Bourne	As Above	Philippabourne@knp-limited.com
Deputy designated Safeguarding Leads	Natalie Bourne Kayley Butler	As Above	Nataliebourne@knp-limited.com Kayleybutler@knp-limited.com

Aims

This policy aims to:

- Encourage individuals affected to report suspected wrongdoing as soon as possible in the knowledge that their concerns will be taken seriously and investigated and that their confidentiality will be respected
- Let all staff in the provision know how to raise concerns about potential wrongdoing in or by the company
- Set clear procedures for how the company will respond to such concerns
- Let all staff know the protection available to them if they raise a whistle-blowing concern



- Assure staff that they will not be victimised for raising a legitimate concern through the steps set out in the policy even if they turn out to be mistaken (though vexatious or malicious concerns may be considered a disciplinary issue)

This policy does not form part of any employee's contract of employment and may be amended at any time. The policy applies to all employees or volunteers who provide services to the company in any capacity.

Definitions

Whistle-blowing covers concerns made that report wrongdoing that is "in the public interest". Examples of whistleblowing include (but are not limited to):

- Criminal offences, such as fraud or corruption
- Students' or staffs' health and safety being put in danger
- Failure to comply with a legal obligation or statutory requirement
- Breaches of financial management procedures
- Attempts to cover up the above, or any other wrongdoing in the public interest
- Damage to the environment

A whistle-blower is a person who raises a genuine concern relating to the above. Not all concerns about the Provision or company count as whistleblowing. For example, personal staff grievances such as bullying, or harassment do not usually count as whistleblowing. If something affects a staff member as an individual, or relates to an individual employment contract, this is likely a grievance. When staff have a concern, they should consider whether it would be better to follow our complaints procedure.

Raising a whistleblowing concern

When to raise a concern:

Staff should consider the examples given under the sub-heading "definitions" when deciding whether their concern is of a whistleblowing nature. Consider whether the incident(s) was illegal, breached statutory procedures, put people in danger or was an attempt to cover any such activity up.

Who to report to:

Staff should report their concern to Kayley Butler – Director and Business Manager. If the concern is about Kayley Butler or it is believed they may be involved in the wrongdoing in some



way, the staff member should report their concern to either Philippa Bourne – Director and Student Manager or Natalie Bourne – Director and Pastoral Manager.

How to raise the concern:

Concerns should be made in writing wherever possible. They should include names of those committing wrongdoing, dates, places and as much evidence and context as possible. Staff raising a concern should also include details of any personal interest in the matter.

Procedure for responding to a concern

Investigating the concern

When a concern is received by the business manager - referred to from here on as the 'recipient' - they will:

- Meet with the person raising the concern within a reasonable time. The person raising the concern may be joined by a trade union or professional association representative.
- Get as much detail as possible about the concern at this meeting and record the information. If it becomes apparent the concern is not of a whistle-blowing nature, the recipient should handle the concern in line with the appropriate policy/procedure.
- Reiterate, at this meeting, that they are protected from any unfair treatment or risk of dismissal as a result of raising the concern. If the concern is found to be malicious or vexatious, disciplinary action may be taken (see subheading "malicious or vexatious allegations" of this policy).
- Establish whether there is sufficient cause for concern to warrant further investigation. If there is:
 - ❖ The recipient should then arrange a further investigation into the matter, involving the Directors, if appropriate. In some cases, they may need to bring in an external, independent body to investigate. In other cases, they may need to report the matter to the police.
 - ❖ The person who raised the concern should be informed of how the matter is being investigated and an estimated timeframe for when they will be informed of the next steps.

Outcome of the investigation:

Once the investigation – whether this was just the initial investigation of the concern, or whether further investigation was needed – is complete, the investigating person(s) will prepare a report detailing the findings and confirming whether or not any wrongdoing has occurred. The report will include any recommendations and details on how the matter can be rectified and whether or not a referral is required to an external organisation, such as the local authority or police.

They will inform the person who raised the concern of the outcome of the investigation, though certain details may need to be restricted due to confidentiality.



Beyond the immediate actions, the directors and other staff, if necessary, will review the relevant policies and procedures to prevent future occurrences of the same wrongdoing. Whilst we cannot always guarantee the outcome sought, we will try to deal with concerns fairly and in an appropriate way.

Malicious or vexatious allegations

Staff are encouraged to raise concerns when they believe there to potentially be an issue. If an allegation is made in good faith, but the investigation finds no wrongdoing, there will be no disciplinary action against the member of staff who raised the concern. If, however, an allegation is shown to be deliberately invented or malicious, the trust will consider whether any disciplinary action is appropriate against the person making the allegation.

Escalating concerns beyond the company

The company encourages staff to raise their concerns internally, in line with subheading "Raising a whistleblowing concern" of this policy, but recognises that staff may feel the need to report concerns to an external body, which could include:

- The Department for Education
- The Local Authority Designated Officer (LADO)
- NSPCC Whistleblowing helpline
- HMRC
- The Police

Monitoring and reviewing

This policy is monitored regularly and will be reviewed annually as a minimum to ensure the effectiveness of our strategies.