



## **Whistle blowing Policy**

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This policy is designed to protect apprentices who are registered with us, minimise the effect of an adverse effect and ensure that we comply with all relevant legislation, guidance and standards.

#### 1. Introduction

Advanced Analytics Solutions is committed to the highest standards of quality, honesty, openness and accountability.

As part of that commitment, the company encourages employees, learners, employers or others with serious concerns about any aspect of work to come forward and express those concerns. We recognise that people will need to come forward on a confidential basis. We want to make it clear that they can do so without fear of reprisal or victimisation.

This statement is intended to underline our commitment, and support to those who come forward to express their concerns. Employees are often the first people who realise that there may be something seriously wrong within the organisation, but may not express their concerns. This could be for a number of reasons; because speaking up may be regarded as disloyal by colleagues or the organisation, because of fear they may be victimised, doubts about reporting what might only be a suspicion, or because it might seem easier to ignore it and not get involved.

'Whistle blowing' is often understood as reporting a concern outside the organisation because, for various reasons, they do not wish or feel able to raise the matter internally. This Whistle blowing policy aims to encourage and enable people to raise serious concerns by 'blowing the whistle' within the company, rather than overlooking a problem or raising the issue outside.

When we find a problem, we will always deal with it seriously.





# 2. Confidential reporting

We know that it is never easy to report a concern, particularly one which may relate to fraud or corruption. We urge you to come forward with any concerns at an early stage, and before problems have a chance to become serious.

If you prefer, we are happy for you to come forward with another colleague, a friend or other advisor to report a concern.

We will support and protect people from reprisals or victimisation. If you come forward with a concern, you can be confident that this will not affect your career, or your enjoyment of your job. This applies equally if you come forward in good faith with a concern which turns out later not to be justified.

We will do anything we can to respect your confidentiality, if you have requested this.

If anyone tries to discourage you from coming forward, to express a concern or suppresses information you have given them, we will treat this as a disciplinary offence. In the same way, we deal with anyone who criticises or victimises you after a concern has been expressed.

The company requires that you do not disclose confidential, false or misleading information. Whilst you should be aware of your duty of confidentiality, when taking a concern outside the company it is recognised that, on occasion, it may be difficult to comply with.

The Public Interest Disclosure Act 1998 (which came into force to July 1999) gives legal protection to Whistleblowers who honestly and reasonably believe that the information they disclose or the allegations they make are substantially true. The act extends protection given to health and safety representatives to individuals who raise genuine concerns about health and safety or environmental risks.

#### 3. Who to contact

In most cases, you should be able to raise your concerns with one of the Partners and if necessary, you should ask for a confidential meeting. All such contacts will be treated in confidence.





#### 4. The company's response

If you come to us with a concern, we will look into it carefully and thoroughly. We have to be fair to you, but also to any other person involved. If someone is potentially being accused of misconduct, we have to find out their side of the story as well. In our investigation, we will respect any concerns you have expressed about your safety or career.

If you request, we will try to let you know the result of our investigation and about any action that is proposed. However, in doing this, we have to respect the confidentiality of other people.

The action that will be taken by the company, will depend on the nature of the concern. The matters raised may be investigated by management, by internal enquiry or through the disciplinary process. Alternatively, they may be subjected to independent enquiry. Relevant matters may also be subject to investigation by the police. However, in order to safeguard both the company and individuals, initial enquires will be made to determine whether the commitment of resources to any form of investigation would be appropriate. These initial enquires would also assist in determining the most appropriate process for the consideration of the concern. Any necessary action that is required urgently, would be carried out ahead of any assessment/investigation process.

Concerns or allegations raised which fall within the scope of established procedures, will be referred for consideration under those procedures.

A referral of a concern will be acknowledged within 5 days, with an indication of how the company proposes to deal with the matter and likely timescale. If it is not possible to complete the initial enquires within the seven days, the letter of acknowledgement will explain. If a decision is made not to investigate, the reasons will be given.

Some matters may be investigated without the need for initial enquiries to be made. Similar, some concerns may be capable of resolution by agreed action without the need for investigation.

The level of contact between you and whoever is considering the issue, will depend on the nature of the matters raised, the potential difficulties involved as well as the clarity of the information may be sought from you.





The company will take appropriate steps to minimise any difficulties that you may experience as a result of using the Whistle blowing policy.

You will be given as much information as possible on the outcomes of the investigation, subject to the constraints of our duty of confidentiality to staff or directors or any other legal constraints. The objective of the various responses would be to assure you the matter has been addressed.

Abuse of the confidential reporting process, for instance by maliciously raising unfound allegations, will be treated as a disciplinary matter. But no-one who comes forward in good faith has anything to fear.

### 5. Monitoring the policy

Confidential records will be kept of all matters raised through the Whistle blowing policy and the directors will review reports with an assessment of the effectiveness of the policy and any emerging patterns.