



whistleblowing policy (confidential reporting)

1. What is Whistleblowing?

In this policy 'whistleblowing' means the reporting by employees of suspected misconduct or illegal acts within Armada Training Solutions Ltd (Armada).

The aim of this Policy is to encourage employees and others who have serious concerns about any aspect of Armada's work to come forward and voice those concerns.

Employees are often the first to realise that there may be something seriously wrong within Armada. 'Whistleblowing' is viewed by Armada as a positive act that can make a valuable contribution to Armada's efficiency and long-term success. It is not disloyal to colleagues or Armada to speak up. Armada is committed to achieving the highest possible standards of service and the highest possible ethical standards in its operations and practices. To help achieve these standards it encourages freedom of speech.

If you are considering raising a concern you should read this Policy first. It explains:

- The type of issues that can be raised.
- How the person raising a concern will be protected from victimisation and harassment.
- How to raise a concern.
- What Armada will do.

2. What is the aim of the Policy and when does it apply?

2.1. Aims of the Policy

The Policy is designed to ensure that you can raise your concerns about wrongdoing or malpractice within Armada without fear of victimisation, subsequent discrimination, disadvantage or dismissal.

It is also intended to encourage and enable you to raise serious concerns within Armada, rather than ignore a problem or 'blow the whistle' outside.

This Policy aims to:

- Encourage you to feel confident in raising serious concerns at the earliest opportunity and to question and act upon concerns about practice.
- Provide avenues for you to raise those concerns and receive feedback on any action taken.
- Ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied.
- Reassure you that you will be protected from possible reprisals or victimisation if you have made any disclosure in good faith.

2.2. Scope of this Policy

This Policy is intended to enable those who become aware of wrongdoing in Armada affecting some other person or service, to report their concerns at the earliest opportunity so that they can be properly investigated.

This Policy is not intended to replace existing procedures in the following circumstances:

- If your concern relates to your own treatment as an employee. In this case, you should raise it under the existing grievance or harassment procedures.
- If a client has a concern about services provided. These should be raised as a complaint.



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2.3. Who can raise a concern under this Policy?

The Policy applies to all:

- Employees of Armada.
- Contractors working for Armada, for example trainers and agency staff.
- Employees of suppliers.

2.4. What should be reported?

Any serious concerns that you have about service provision or the conduct of employees of Armada, or others acting on behalf of Armada, e.g. contractors, that:

- Make you feel uncomfortable in terms of known standards.
- Are not in keeping with Armada's ethics, standards and policies.
- Fall below established standards of practice.
- Are improper behaviour.

These might relate to:

- Conduct which is an offence or a breach of the law (a criminal offence has been committed or failing to comply with any other legal obligation).
- Disclosures related to miscarriages of justice.
- Racial, sexual, disability or other discrimination.
- Health and safety of other employees, contractors or clients.
- Damage to the environment.
- Unauthorised use of public funds or other assets.
- Possible fraud and corruption.
- Neglect or abuse of clients.
- Other unethical conduct.

This list is not exhaustive.

3. Protecting the Whistleblower

3.1. Your legal rights

This policy has been written to take account of the Public Interest Disclosure Act 1998 which protects workers making disclosures about certain matters of concern, when those disclosures are made in accordance with the Act's provisions and in the public interest.

The Act makes it unlawful for Armada to dismiss anyone or allow them to be victimised on the basis that they have made an appropriate lawful disclosure in accordance with the Act.

Rarely, a case might arise where it is the employee that has participated in the action causing concern. In such a case it is in the employee's interest to come into the open as soon as possible. Armada cannot promise not to act against such an employee, but the fact that they came forward may be taken into account.

3.2. Harassment or Victimisation

Armada is committed to good practice and high standards and to being supportive of you as an employee.

Armada recognises that the decision to report a concern can be a difficult one to make. If you honestly and reasonably believe what you are saying is true, you should have nothing to fear because you will be doing your duty to Armada, your colleagues and Armada's.

Armada will not tolerate any harassment or victimisation of a whistleblower (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith and will treat this as a serious disciplinary offence which will be dealt with under the disciplinary rules and procedure.



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3.3. Support to you

Throughout this process:

- You will be given full support from a Director of Armada.
- Your concerns will be taken seriously.

3.5. Anonymous Allegations

This Policy encourages you to put your name to your allegation whenever possible. If you do not tell us who you are it will be much more difficult for us to protect your position or to give you feedback. This policy is not ideally suited to concerns raised anonymously.

Concerns expressed anonymously are much less powerful but they may be considered at the discretion of Armada. In exercising this discretion the factors to be taken into account would include:

- The seriousness of the issue raised.
- The credibility of the concern.
- The likelihood of confirming the allegation from other sources.

3.6. Untrue Allegations

If you make an allegation in good faith and reasonably believing it to be true, but it is not confirmed by the investigation, Armada will recognise your concern and you have nothing to fear. If however, you make an allegation frivolously, maliciously or for personal gain, appropriate action that could include disciplinary action, may be taken.

4. Raising a Concern

4.1. Who should you raise your concern with?

You should normally raise concerns with Steven Smith, Managing Director, in person, in writing via post or email (steven.smith@armada.co.uk), or by phone on 01527 834781.

The address for postal correspondence is Armada, 6 West Court, Saxon Business Park, Bromsgrove, B60 4AD.

The earlier you express your concern, the easier it is to take action. You will need to provide the following information:

- The nature of your concern and why you believe it to be true.
- The background and history of the concern (giving relevant dates).

You will need to demonstrate that you have a genuine concern relating to suspected wrongdoing or malpractice within Armada, and that there are reasonable grounds for your concern.

You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns.

5. What Armada will do

Armada will address your concerns as quickly as possible.

In order to be fair to all employees, including those who may be wrongly or mistakenly accused, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

The investigation may need to be carried out under terms of strict confidentiality, i.e. by not informing the subject of the complaint until (or if) it becomes necessary to do so. In certain cases however, such as allegations of ill treatment of others, suspension from work may have to be considered immediately.

Protection of others is paramount in all cases.



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Where appropriate, the matters raised may:

- Be investigated internally.
- Be referred to the police and/or other relevant authorities.

Within ten working days of a concern being raised, the person investigating your concern will write to you:

- Acknowledge that the concern has been received.
- Indicate how Armada proposes to deal with the matter.
- Tell you whether further investigations will take place and, if not, why not.

The amount of contact between you and the person investigating the issues will depend on the nature of the matters raised, the potential difficulties involved and the clarity of your information. You may be interviewed to ensure that your disclosure is fully understood.

You can be assured that your disclosure will be properly addressed. Unless there are any legal reasons why this cannot be done, you will be kept informed of the progress and outcome of any investigation.

6. Responsibility

Steven Smith, Managing Director, has responsibility for the maintenance and operation of this Policy.

7. How the Matter can be Taken Further

This Policy is intended to provide you with an avenue within Armada to raise concerns. Armada hopes you will be satisfied with any action taken. If you are not, and you feel it is right to take the matter outside Armada, you can raise the issue with:

- The police.
- Other relevant bodies, as prescribed by legislation.

You should not disclose information that is confidential to Armada or to anyone else, such as a client or contractor of Armada, except to those included in the list of prescribed contacts.

This Policy *does not* prevent you from taking your own legal advice.

8. Review of the Policy

This Policy will be reviewed annually.

9. Corporate Recording and Monitoring

Steven Smith, Managing Director, will maintain a corporate register containing all concerns that are brought to his attention.

Steven Smith
Managing Director, Armada Training Solutions Ltd

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