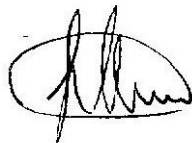


Time2Train Ltd

Whistleblowing Policy

Signed:



Director: John Young

Date: 26/04/2023

Next review Date: 26/04/2024

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INTRODUCTION

Whistle blowing within this policy is concerned with the disclosure internally by employees of what they consider to be malpractice as well as illegal acts or omissions at work as set out below. This policy is intended to encourage and enable employees to raise serious concerns in a responsible and effective manner in accordance with our commitment to the highest standards of openness, honesty and accountability.

PURPOSE

This policy aims to:

- enable employees who believe they have discovered malpractice or impropriety to raise such issues in good faith without fear of reprisals
- ensure that employees get a response to their concerns
- provide employees with the necessary guidance on how to voice their concerns
- advise employees who are not satisfied with the initial response on the further channels available to bring concerns to the attention of management of Time2Train as appropriate.

SCOPE

This policy is designed to assist employees in raising matters internally at an appropriate level on those concerns highlighted below. It is not designed to question financial or business decisions taken by the company nor should it be used to reconsider matters which are being or have been addressed under complaint, harassment, disciplinary, company grievance or other company procedures. Concerns that may be raised include:

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- Financial malpractice, impropriety or fraud
- Failure to comply with legal obligations or statutes
- Miscarriage of justice
- Criminal activity
- Unethical behaviour
- Dangers to health and safety or the environment
- Attempts to conceal any of the above

SAFEGUARDS

The Public Interest Disclosure Act, which came into effect in 1998, gives legal protection to employees against being dismissed or penalised by their employers as a result of disclosing serious concerns. Time2Train has endorsed the provisions set out overleaf so that no member of staff should fear reprisals or feel at a disadvantage when raising legitimate issues.

PROTECTION

Time2Train will not tolerate any harassment or victimisation of the discloser, including informal pressures, and will treat any allegations of this seriously. Where an allegation of harassment or victimisation of a discloser is upheld, this will be dealt with in accordance with the company's disciplinary procedures.

ANONYMOUS ALLEGATIONS

The company encourages employees to put their name to any disclosures they make. Concerns expressed anonymously are much less credible but they may be considered at the discretion of the company. In exercising this discretion, the factors taken into account will include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegations from attributable sources.

UNTRUE ALLEGATIONS

If an employee makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that employee. In making the disclosure, the employee should exercise due care to ensure the accuracy of any information supporting the allegation.

If an employee makes malicious or vexatious allegations and particularly if the employee persists in making them, disciplinary action may be taken.

PROCEDURES FOR MAKING A DISCLOSURE

As a first step the employee should raise concerns with John Young, Director or Leanne Hughes, Operations Manager. Concerns may be made confidentially in person but preferably in writing and should include:

- The background to the concern
- The alleged malpractice/impropriety giving cause for concern

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- The names, dates and places relevant to issue being raised
- The reasons for making the disclosure

Depending on the nature and seriousness of the issue and its relevance to public funding, it may be discussed with the audit committee.

Should the route above not be acceptable, the employee has the following additional avenues open to them:

- The charity 'Public Concern at Work', Suite 306, 16 Baldwin Gardens, London, EC1N 7RJ. E-mail: whistle@pcaw.co.uk.
- Other external sources include contacting the Police, the Audit Commission
- Health & Safety Executive.

TIMESCALES

Due to the varied nature of the concern, it is not possible to lay down precise timescales. Investigations involving the police may be time-consuming because of the complexity of issues, procedures to be followed and number of people involved.

OUTCOMES

Depending on the findings of the investigation, outcomes may vary from no further action at all to sanction against perpetrators. Such sanctions may range from a verbal warning to dismissal from the company and criminal prosecution.

If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted but the employee is not satisfied with the outcome, Time2Train recognises the lawful rights of employees and ex-employees to make disclosures to prescribed persons such as the Health and Safety Executive, Audit Commission etc where justified.

REVIEW

This policy will be reviewed annually as part of our quality assurance procedures. Reviews will also take place when there are changes, legislative updates and updates defined by the ESFA and IfATE.