



## Whistleblowing Policy

### **High Impact Academic Coaching Ltd**

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Company Number: 12386860

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**Audience:** All Staff

**Owner:** Managing Director

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### **Introduction**

Employees/associates may, in properly carrying out their duties, have access to, or come into contact with, information of a confidential nature. Their terms and conditions provide, that except in the proper performance of their duties, employees are forbidden from disclosing, or making use of in any form whatsoever, such confidential information.

However, the law allows employees/associates to make a “protected disclosure” of certain information. In order to be “protected”, a disclosure must relate to a specific subject matter (clause 2) and the disclosure must also be made in an appropriate way (clause 3). Whistleblowing protection is confined to a disclosure which, in the reasonable belief of the employee making the disclosure, is made in the public interest.

**High Impact Academic Coaching Ltd** is committed to compliance with the Bribery Act (2010). The Company actively encourages a culture of honesty and openness and therefore all employees are required to bring up to their manager, or other designated person, any issue that, in the employee’s opinion, might constitute bribery or corruption.

### **Specific Subject Matter**

If, in the course of employment, an employee becomes aware of information which they reasonably believe, tends to show, one or more of the following:

- a) That a criminal offence has been committed, is being committed or is likely to be committed.
- b) That a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject.
- c) That a miscarriage of justice has occurred, is occurring or is likely to occur.
- d) That the health or safety of any individual has been, is being or is likely to be, endangered.

- e) That the environment has been, is being or is likely to be, damaged.
- f) That information tending to show any of the above, is being, or is likely to be, deliberately concealed.
- g) That the business, or any associated person, has been, is being, or is likely to be, receiving or offering bribes.
- h) That any foreign official has been, is being, or likely to be, bribed or offered facilitation payment by the company, or any associated person.

They must use the Company's disclosure procedure, as set out below.

### **Disclosure Procedure**

Information which an employee/associate reasonably believes tends to show one or more of the above should promptly be disclosed to **Kevin Fryer/Managing Director** so that any appropriate action can be taken.

Employees/associates will suffer no detriment, of any sort, for making such a disclosure in accordance with this procedure.

However, failure to follow this procedure may result in the disclosure of information losing its "protected status".

For further guidance in relation to this matter, or concerning the use of the disclosure procedure generally, employees/associates should speak in confidence to **Kevin Fryer/Managing Director**.

### **Commitment to Staff**

**High Impact Academic Coaching Ltd** assures its staff that their concerns about any possible mistreatment of its clients will be listened to and investigated.

Staff members are encouraged to raise any concern directly or in writing. They are also entitled to make their representations accompanied by a friend, colleague or trade union representative, as they decide and think fit. They might also wish to obtain witness statements.

**High Impact Academic Coaching Ltd** undertakes to assess and investigate any concerns impartially and objectively, so that it can be fair to all parties concerned in seeking to clarify the facts before taking further action.

**High Impact Academic Coaching Ltd's** management will keep any staff members, affected by an investigation, aware of the actions being taken and the outcomes, considering the need to respect the possible confidentiality of some of the information relating to other staff members and clients, which has developed in the process of the investigation.

Information will, usually, be treated with the utmost confidence. This might not be possible in all cases, e.g. if the alleged malpractice requires reporting to the police and/or the local safeguarding adult's/children's authority.

Staff are also made aware that all instances of alleged, or actual, abuse must be notified to the local safeguarding adults'/children's authority under its notification of serious incident procedures.

## Investigating and dealing with allegations

The Managing Director takes reports from whistle-blowers seriously and investigates all allegations thoroughly. Any allegations against colleagues, however, which are found to be unwarranted or malicious, may render the person who made them liable to disciplinary action.

## Further Information

We provide staff with the following information, which they may need to help raise a concern in confidence:

- Whistleblowing Helpline NSPCC: Tel. 0800 028 0285;  
email: [help@NSPCC.org.uk](mailto:help@NSPCC.org.uk)
- Safeguarding Authority/Multi-Agency Safeguarding Hub (MASH): 0300 500 80 90.
- [Public Concern at Work](#): (for advice and guidance on ways forward).

## Training

All new staff receive training on this whistleblowing policy as part of the induction training. All staff receive updated training as policies change.

This policy applies to the following people in our organisation	<ul style="list-style-type: none"> <li>• All employed staff (both Professional and Administrative) and all those who are engaged as associates (i.e. self-employed).</li> </ul>
Policy Written by	Louisa Goldsmith Compliance Officer
Date Policy written	January 2020
Who has or can give authority to change policy	Kevin Fryer Managing Director
Where is this policy kept	<a href="https://drive.google.com/drive/u/2/folders/15IDSTR3dG1x1Rv-hEgvZdMPlq4hD-4R">https://drive.google.com/drive/u/2/folders/15IDSTR3dG1x1Rv-hEgvZdMPlq4hD-4R</a>

Date	Reviewer	Version	Date for Next Review	Date of recirculation
January 2020	KF	2	January 2021	January 2021
January 2021	KF	3	January 2022	January 2022
January 2022	KF	4	January 2023	January 2023
January 2023	KF	5	January 2024	January 2024
January 2024	KF	6	January 2025	January 2026
January 2025	LG	7	January 2026	
