Confidential Reporting (Whistleblowing) Policy

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1. What this policy as about and why we need it

Our vision is “be there to support people when they need us”. To achieve this, as part of our organisational strategy to 2030 we put people first to ensure they continue to be at the heart of what we do. We have three priority areas that our work aligns to - Home, Support and Quality.

This policy has been devised in accordance with the provisions of the Public Interest Disclosure Act 1998 and aims to bring into the open, concerns of employees and the public relating to issues concerning dishonesty or malpractice within the organisation.

Acis is committed to the highest possible standard of honesty, openness, and accountability. This policy makes it clear that an individual can raise a confidential issue to Acis without fear of retribution. It is also intended to encourage and enable an employee or other individual to raise concerns within the organisation rather than overlooking a problem or feeling the need to do so directly to an external agency in the first instance.

This policy is designed to ensure that any fraud, misconduct, or wrongdoing is reported and properly dealt with. It provides guidance, direction and support to any individuals who feel the need to raise any concerns they may have about the conduct of others in the organisation or the way in which the organisation is run. The policy outlines the way in which individuals can raise any concerns that they may have, and how these concerns are dealt with.

2. Who does this policy apply to?

This policy and procedure applies to all employees at Acis Group (“Acis”) and its subsidiaries. Other individuals performing duties in relation to Acis, such as agency

workers, volunteers, contractors or learners, are encouraged to use it. Whilst written as an employee policy, the principles that the policy cover shall apply equally in connection with similar issues raised by customers, stakeholders, Board Members, or other members of the public.

3. Our policy

Policy Statement

Our Whistleblowing Policy is intended to foster a culture of transparency and accountability; to empower and guide all individuals on how to raise any serious concerns they have about unethical or unlawful conduct without the worry of being disadvantaged or victimised in any way as a result of a disclosure.

Whistleblowing concerns – These are linked to those within the public interest, which would involve the most serious allegations. Other concerns should be routed through our grievance processes for employees, or our complaints processes for all others.

We are committed to providing:

a) a safe, effective and clear route for individuals to be able to raise their concerns
b) that these concerns are investigated thoroughly by appropriate individuals
c) that through our value of honesty, individuals are encouraged to raise issues at an early stage, so that appropriate steps can be taken to safeguard the interests of all.

It is hoped that if something goes wrong, we have the opportunity to put it right, and justify the trust placed in us by our employees, customers, partners, funders and our communities. Therefore, through disclosing concerns we will:

- Respect confidentiality and provide support
- Provide protection from harassment or victimisation, should the allegation be based on reasonable belief and made in the public interest
- Investigate thoroughly and report back on the outcome of our investigations and, if possible, on any resultant action proposed.

4. Procedure

The policy aims to:

- Provide ways for an individual to raise concerns and receive feedback on any action taken where appropriate
- Allow an employee or other party to take the matter further if they are dissatisfied with the Organisations' response; and
- Reassure employees and others that they will be protected from reprisals or victimisation for "whistleblowing" if they have acted on reasonable belief.

What should be reported?

Qualifying disclosures are disclosures of information where the individual reasonably believes (and it is in the public interest) that one or more of the following matters is either happening, has taken place, or is likely to happen in the future. Although this list is not exhaustive, concerns raised may include:

- Failure to comply with a legal obligation
- A danger to the health and safety of any individual

- Danger to the environment
- A criminal offence has been committed, is being committed or is likely to be committed
- Professional malpractice
- Financial malpractice, impropriety, fraud or bribery
- A miscarriage of justice
- Inadequate Safeguarding arrangements
- Sexual harassment
- Attempts to conceal any of the above

Whistleblowing involves concerns that may affect customers, the public, other employees, or Acis itself.

A grievance, on the other hand, is a personal complaint about an individual's own employment situation for example if an employee feels a management decision affects them unfairly or feel they are not being treated properly.

Any concerns raised that are not covered by whistleblowing, will be dealt with by the most appropriate policy in place (see list of policies and relevant documentation at the end of this document).

Raising a concern

In respect of employees, as a first step, any concerns should be raised with the employee's line manager. Employees will need to make it clear to their manager, or other person they inform, the reasons for their concerns.

If they believe the line manager to be involved, or for any reason do not wish to approach their line manager, it may be more appropriate to inform the Whistleblowing Lead, or a member of the senior management team. At this stage it may be asked for the concerns to be put in writing, providing details on the background and history of their concern, giving names, dates and places where possible.

Employees: Where an employee is unsure of who to approach or what action to take, they should approach the Whistleblowing Lead for a confidential discussion on whistleblowing@acisgroup.co.uk. The nominated Whistleblowing Lead is the Head Of Corporate Services.

Alternatively, an employee may email confidential.reporting@acisgroup.co.uk, where it is received by the Chief Executive, the Chair of the Board and Chair of Audit and Risk Committee to ensure that there is appropriate consideration of the issues raised.

Non employees: Concerns raised by non-employees should be raised directly with the nominated Whistleblowing Lead, or any member of the Executive Leadership Team.

Confidentiality

All concerns raised by employees will be treated in confidence and every effort will be made not to reveal the individual's identity if they so wish. However, at an appropriate time the individual may need to come forward to make a witness statement as part of the evidence if disciplinary action is to be taken against an individual or a disclosure is required to a regulatory agency or governmental body.

Anonymous Allegations

This policy encourages all employees to put their names to concerns. Concerns expressed anonymously are much less powerful, but they will be considered at our discretion. In exercising this discretion, the factors to be taken into account would include:

- the seriousness of the issue raised;
- the credibility of the concern; and
- the likelihood of confirming the concern from attributable sources.

Support

We recognise that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. We will not tolerate harassment or victimisation and will take action to protect an employee or other party when they raise a concern in good faith. We will treat any harassment or victimisation as a serious disciplinary offence that will be dealt with under the Company's Conduct Policy.

This does not mean that if an employee is already the subject of a disciplinary procedure that proceedings will be halted as a result of their whistleblowing.

Throughout this process:

- The individual will be given full support from senior management
- concerns will be taken seriously, and
- We will do all we can to support through any investigation

For those who are not Acis Group employees, we will endeavour to provide appropriate advice and support wherever possible.

Our commitment to this policy means that individuals will be protected against any detriment or disadvantage. Support, either of a practical nature or in being able to discuss matters as things progress, will be available from the People Services department.

Support will also be available for those individual(s) that may be accused or directly affected by any whistleblowing allegations; recognising the difficulties that may arise from being involved in such serious concerns.

Reasonable Belief and Untrue Allegations

An employee who makes an allegation on a reasonable belief has the right not to be dismissed, subjected to any other detriment, or victimised, because he/she has made a disclosure, even where this is not confirmed by the subsequent investigation.

If the employee makes an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against the employee concerned.

Investigation

The earlier a concern is raised, the easier it is to take action. Therefore, any concerns raised will be passed to the appropriate investigating officer as soon as possible, and within 3 working days.

The investigating officer will take the lead on investigating any concerns through an impartial unbiased investigation and communicating findings and any corrective actions.

Deciding on who will be the investigating officer:
This will be decided by the Whistleblowing lead in conjunction with the CEO
Depending on the complaint, the investigating officer will normally be a member of Acis' Senior Management Team.

If the complaint is against a member of the Senior Management Team, it will normally be investigated by an appropriate member of Acis' Executive Leadership Team. Complaints against a member of the Executive Leadership Team will normally be investigated by the Chief Executive.

Complaints against the Chief Executive should be referred to the Chair of the Board who may investigate the matter directly or refer the matter for independent investigation, reporting to the Group Board as appropriate.

Complaints against the Board should be notified to the relevant external agency. Confidential advice can be obtained through Protect (see 'Independent Advice' section).

The investigation may involve the employee and other individuals involved giving a written statement. The statement will be taken into account, and they will be asked to comment on any additional evidence obtained.

Within 5 working days of a concern being raised, the investigating officer will write to the person who raised the concern with the following:

- Acknowledgement that the concern has been received
- Indication on how Acis proposes to deal with the concern
- Supply of information on employee support measures available
- Advising if further investigations are likely to take place

Wherever possible Acis Group would want the opportunity to follow its internal procedures to investigate concerns. Any direct and premature contact with an outside organisation before internal procedures have been followed may be classed as misconduct. If, however, an employee believes this is in conflict with any legal requirement, they can access confidential advice through Protect (see 'independent Advice' below).

Taking action
As a result of the investigation various actions may be taken to ensure claims are treated with the highest level of importance. The Investigating Officer will present their findings and subsequent actions to the Audit and Risk Committee in the next meeting, which will consider any necessary action, including reporting the matter to the Group Board and/or to any appropriate government department or regulatory agency.

If disciplinary action is required, the Investigating Officer will report the matter to the People Services Department and start the disciplinary procedure.

When the investigation has concluded, all appropriate individuals concerned will be told the outcome of the investigation and what the action has been or is proposed to be taken. If no action is to be taken, the reason for this will be explained.

Further recourse

If at the end of the process a person feels their concern was not taken seriously, or the wrongdoing is still going on, the individual can inform the relevant prescribed person or body, as outlined in the Government guidance below.

5. Independent Advice

Premature contact with any external organisation before Acis has had an opportunity to follow internal procedures, may be classed as misconduct. If, however, an employee is unsure whether to use this policy or they want independent advice they should contact the independent charity Protect (https://www.pcaw.org.uk/) for a confidential discussion.

Further advice may be sought from:

- The Charity Commission (https://www.gov.uk/government/organisations/charity-commission),
- Department for Education (www.gov.uk/government/organisations/department-for-education)
- The Government Advice Website (www.gov.uk/whistleblowing)
- Homes England (https://www.gov.uk/government/organisations/homes-england)
- The NSPCC Whistleblowing Advice Line (help@nspcc.org.uk)
- Ofsted (www.gov.uk/government/organisations/ofsted)
- The Regulator of Social Housing (https://www.gov.uk/government/organisations/regulator-of-social-housing)
- Modern Slavery & Exploitation Helpline: 08000 121700 (Modern Slavery Helpline)

These bodies all have a role to play in the work that Acis undertakes.

Direct disclosures to the DfE

Direct disclosures can also be made directly to the Department for Education (DfE). Full details of how to do this can be located on the www.gov.uk website, via either the Customer Help Portal, or write to the team direct via the website.

How we will monitor this policy

We will ensure that a copy of this policy is made available to all employees via the company's intranet and via our People Services department. We will engage with the Employee Forum to ensure this policy is kept up to date and fit for purpose and reflects the needs of both the business and employees.

We will have a standing agenda item at each Audit and Risk committee meeting to confirm if any instances have been reported under this policy.

Policies and documents that link into this policy

- Disciplinary Policy
- Counter Fraud & Bribery Policy
- Dignity at Work Policy
- Grievance Policy
- Engineer handbook

Links to other policies, legislation and/or regulations

- Employment Rights Act 1996
- Public Interest Disclosure Act 1998
- Data Protection Act 2018
- General Data Protection Regulation (2016/679 EU)
- Fraud Act 2006
- Bribery Act 2010
- Modern Slavery Policy and Statement