

PACE Northwest – Whistleblowing Policy

Approved by: Board of Directors

Policy owner: Compliance & HR Manager

Effective date: 29 August 2025

Next review due: Annually (or sooner if law/guidance changes)

1. Purpose

PACE Northwest is committed to the highest standards of openness, integrity and accountability. Staff, learners, employers, contractors and partners are encouraged to raise concerns about wrongdoing at the earliest opportunity, without fear of victimisation.

This policy provides a framework for reporting concerns about malpractice, unlawful conduct, or breaches of policy in line with the **Public Interest Disclosure Act 1998 (PIDA)**.

2. Scope

This policy applies to:

- All employees, governors/directors, agency staff, contractors, consultants and volunteers.
- Learners, apprentices, employers and partners who wish to raise genuine concerns about wrongdoing that affects the wider public interest.

It covers concerns relating to:

- Criminal offences.
- Breaches of legal obligations.
- Miscarriages of justice.
- Risks to health and safety.
- Damage to the environment.
- Deliberate concealment of malpractice.
- Safeguarding or Prevent concerns.

- Fraud, bribery or corruption.

Personal grievances or complaints (e.g., bullying, terms of employment) should be raised under the **Grievance Policy** or **Complaints Procedure**, not under this policy.

3. Principles

- **Confidentiality:** concerns will be treated in confidence and every effort made to protect the whistleblower's identity.
- **Protection:** whistleblowers will not suffer dismissal, detriment or victimisation for raising concerns in good faith.
- **Fairness:** allegations will be investigated promptly, fairly and objectively.
- **Transparency:** outcomes will be communicated, subject to legal and confidentiality constraints.

4. Reporting concerns

Concerns should be reported as soon as possible.

Internal reporting routes

- Email: **becs@pace-com.org** (monitored confidentially by the Compliance & HR Manager).
- Direct to the **Designated Safeguarding Lead (DSL)** for safeguarding concerns.
- To any Director if the concern relates to the Compliance & HR Manager.

External reporting (if internal routes are not appropriate)

If you believe your concern has not been addressed, or you reasonably believe you would be victimised for raising it internally, you may raise it with a prescribed external body, such as:

- Education & Skills Funding Agency (ESFA).
- Ofsted.
- Awarding Organisations.
- Health and Safety Executive (HSE).
- The Charity Commission (if applicable).
- Information Commissioner's Office (ICO).
- Police or relevant regulator.

5. How concerns are handled

1. **Acknowledgement:** Within 5 working days of receipt.
2. **Assessment:** Initial review by the Compliance & HR Manager or DSL to determine next steps.
3. **Investigation:** A fair and proportionate investigation will be carried out, possibly involving external specialists.
4. **Outcome:** Findings and actions shared with the whistleblower (subject to confidentiality).
5. **Closure:** Records maintained securely in the Whistleblowing Register.

6. Safeguarding and Prevent concerns

- Concerns about child protection, vulnerable adults, or radicalisation must be reported immediately to the DSL via **becs@pace-com.org**.
- These will follow statutory safeguarding procedures and may involve referral to external agencies.

7. Protection from detriment

- Whistleblowers acting in good faith are protected under the **Public Interest Disclosure Act 1998**.
- Any victimisation, harassment or retaliation against a whistleblower will be treated as a disciplinary offence.
- Malicious or deliberately false allegations may also result in disciplinary action.

8. Record-keeping

- All concerns, investigations and outcomes are recorded in the Whistleblowing Register.
- Records are kept securely and retained in line with data protection legislation.

9. Monitoring and review

- The Board receives an annual anonymised report on whistleblowing activity.
- This policy is reviewed annually or following significant legal changes.

10. Related policies

- Safeguarding & Prevent Policy
- Anti-Corruption & Bribery Policy
- Complaints Procedure
- Grievance Policy
- Data Protection Policy

Confidential whistleblowing contact: becs@pace-com.org

Emergency (immediate danger): dial 999

Version control: v1.0 (29 Aug 2025)