



Whistle Blowing Policy 2023

Purpose of the policy

To ensure there is a recognised process for individuals to raise a concern which without anonymity could make the individual feel that they are not able to raise it. This policy supports this by supporting the individual's right to feedback on concerns and enabling Imbue Ventures LTD and its community to develop from this feedback.

Introduction

- Employees and Directors are often the first to realise that there may be something seriously wrong within the Organisation. However, they may not express concerns because they feel that speaking up would be disloyal to their colleagues or to Imbue Ventures. They may also fear harassment or victimisation. In these circumstances. It may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.
- Imbue Ventures is committed to the highest possible standards of openness, probity and accountability. In line with that commitment, we encourage employees and others with serious concerns about any aspect of Imbue Ventures's work to come forward and voice those concerns. It is recognised that certain cases will have to proceed on a confidential basis. This document makes it clear that staff can do so without fear of reprisals.
- This Whistleblowing Policy is intended to encourage and enable staff to raise serious concerns within Imbue Ventures rather than overlooking a problem or blowing the whistle outside.
- This Whistleblowing Policy has been devised in accordance with the provisions of the Public Interest Disclosure Act 1998 and seeks to bring into the open concerns of the staff and public relating to issues concerning dishonesty involving the organisation.
- This policy supports Imbue Ventures's anti-fraud and corruption approach, and makes it clear that concerns can be raised without fear of reprisals. It is intended to encourage and enable employees and members to raise serious concerns within Imbue Ventures, irrespective of seniority, rank or status, rather than overlooking a problem or reporting the matter externally.

Aims and Scope of the policy

This policy aims to:

- Provide avenues for staff to raise concerns and receive feedback on any action taken;
- Allow staff to take the matter further if they are dissatisfied with Imbue Ventures's response; and
- Reassure staff that they will be protected from reprisals or victimisation for whistleblowing in good faith.

There are existing procedures in place to enable staff to lodge a grievance relating to their own employment. This Policy is intended to cover concerns that fall outside the scope of that procedure.

That concern may be about something that:

- Is unlawful, or
- Is contrary to Imbue Ventures's Standing Orders or policies, or
- Falls below established standards or practice; or
- Amounts to improper conduct

For example (this list is not exhaustive):

- Malpractice or ill treatment of a client/customer
- A criminal offence has been committed, is being committed or is likely to be committed
- Suspected fraud

- Disregard for legislation, particularly in relation to health and safety at work
- Breach of Financial Regulations, Standing Orders
- Showing undue favour over a contractual matter or to a job applicant
- A breach of any code of conduct or protocol
- Information on any of the above has been, is being, or is likely to be concealed.

The overriding concern should be that it would be in the public interest for the malpractice to be corrected and, if appropriate, sanctions applied.

This policy applies to all employees of Imbue Ventures LTD

Safeguards

Harassment or Victimisation

Imbue Ventures recognises 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.

Imbue Ventures will not tolerate harassment or victimisation and will take action to protect staff when they raise a concern in good faith.

Imbue Ventures will treat any harassment or victimisation as a serious disciplinary offence to be dealt with under the Disciplinary Procedure.

This does not mean that if staff are already the subject of disciplinary or redundancy procedures, that those procedures will be halted as a result of their whistleblowing.

Confidentiality

Imbue Ventures will do its best to protect an employee's or other individual's identity when they raise a concern and do not want their name to be disclosed. It must be appreciated that the investigation process may reveal the source of the information and a statement by the individual may be required as part of the evidence.

Anonymous Allegations

This policy encourages individuals to put their name to their allegation. Concerns expressed anonymously are much less powerful, but they will be considered at the discretion of Imbue Ventures.

In exercising the discretion, the factors to be taken into account would include the:

- Seriousness of the issues raised;
- Credibility of the concern; and
- Likelihood of confirming the allegation from an attributable source.

Untrue Allegations

If an individual makes an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against them. If, however, staff makes malicious or vexatious allegations, disciplinary action may be taken against them.

How to raise a concern

Employees who raise concerns that fall within the scope of other Imbue Ventures procedures will not be dealt with in this policy, but will be advised on the appropriate procedure to use. Such employees will still receive protection as detailed in this policy.

As a first step, staff should normally raise concerns with their immediate manager. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. If in doubt, contact the representative member of the Board of Director

Concerns are better raised in writing. Individuals are invited to set out the background and history of their concern, giving names, dates and places where possible, and the reason why they are particularly concerned about the

situation. If an individual does not feel able to put their concern in writing, they can telephone or meet the appropriate person. The earlier a concern is expressed the easier it is to take action.

Although individuals are not expected to prove the truth of an allegation, they will need to demonstrate to the person contacted that there are sufficient grounds for the concern.

Advice and guidance on matters of concern that may be pursued can be obtained from:

- Administrator
- Head of Management (Monitoring Officer)
- Director of Finance
- any of those listed in paragraph (How the matter can be taken Further) below

Staff may invite a representative or work colleague to raise a matter on their behalf.

How Imbue Ventures will respond

The action taken by Imbue Ventures will depend on the nature of the concern and may:

- be resolved by agreed action without the need for investigation
- be investigated internally
- be referred to the Police;
- form the subject of an independent inquiry

In order to protect individuals and Imbue Ventures LTD, initial enquiries will be forwarded to the Monitoring Officer who will consult with the Director of Finance and decide whether an investigation is appropriate and, if so, what form it should take.

In the event of the Monitoring Officer or representative member of the Board of Director being named on the complaint the Executive Principal will take the place of whoever is named. The Monitoring Officer can decide to take no further action if a complaint appears to be trivial or vexatious. All such decisions will be reported to the next meeting of the Governing board of directors.

Concerns or allegations that fall within the scope of specific procedures, for example discrimination issues, will normally be referred for consideration under those procedures. Some concerns may be resolved by agreed action without the need for investigation and staff will be involved in those discussions.

The Monitoring Officer shall report periodically thereon to the Governing board of directors.

If an investigation is required, the Monitoring Officer will consult with the representative member of the Board of Director and the Chair of board of directors and will designate an appropriate officer to investigate the concern.

Following this that officer will, within ten working days, write to the individual:

- Acknowledging that an investigation will be carried out
- Indicating how he/she proposes to deal with the matter
- Giving an estimate of how long it will take to provide a final response
- Telling them whether any initial enquiries have been made
- Telling them whether further investigations will take place, and if not, why not
- Advising them that any investigation will be carried out in the strictest confidence; and
- Keeping them informed of the progress of the investigation.

The amount of contact between the officers considering the issues and the individual will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought.

When any meeting is arranged, staff have the right, if they so wish, to be accompanied by a representative or work colleague who is not involved in the area of work to which the concern relates.

Imbue Ventures will take steps to minimise any difficulties that individuals may experience as a result of raising a concern. For instance, if they are required to give evidence in criminal or disciplinary proceedings, Imbue Ventures will advise them about the procedure.

The Monitoring Officer will report on the outcome of any investigation to the appropriate Governing Board of Directors who will monitor the implementation of the recommendation of the investigation.

How the matter can be taken further

This policy is intended to provide staff with an avenue to raise concerns within Imbue Ventures. Imbue Ventures LTD hopes staff will be satisfied. If they are not, and feel that it is right to take the matter outside Imbue Ventures, the following are possible contact points:

- Chair of the Board of Directors
- Relevant professional bodies or regulatory organisations
- Solicitor
- The Police
- An independent person or organisation nominated for the purpose by Imbue Ventures
- Secretary of State for Education (www.gov.uk/contact-dfe) will provide support with particular issues regarding education and will report annually on all complaints raised with them.

The Monitoring Officer

The Monitoring Officer has overall responsibility for the maintenance and operation of this policy, and s/he will liaise as necessary with representative member of the Board of Director and the appropriate Board of Directors.

The Monitoring Officer maintains a record of concerns raised and the outcomes (but in a form which does not endanger staff confidentiality) and will report as necessary to the Governing board

The Law

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, where those disclosures are made in accordance with the Act's provisions.

The Act is incorporated into the Employments Rights Act 1996, which also already protects employees who take action over, or raise concerns about health and safety at work. For the avoidance of doubt, financial issues are covered by Section 151 Local Government Act 1972, Section 114 of the Local Government Finance Act 1988, The Local Government and Housing Act 1989, and Accounts and Audit Regulations 2003.

Imbue Ventures recognises that in complying with this policy there will be an element of data processing carried out. For more information on how Imbue Ventures processes data please refer to Imbue Ventures's privacy Policy.