# Whistleblowing Policy

Glow Education Project strives at all times to conduct its business with the highest standards of integrity and honesty. It expects all employees to maintain the same standards in everything they do. You are therefore encouraged to report any wrongdoing by Glow Education Project or its employees that fall short of these business principles.

The Public Interest Disclosure Act 1988 protects employees who report wrongdoing within the workplace but it is the aim of this policy to ensure that as far as possible you are able to tell us about any wrongdoing at work which you believe has occurred, is occurring or is likely to occur.

We recognise that employees may not always feel comfortable about discussing their concerns internally, especially if they believe that Glow Education Project itself is responsible for the wrongdoing. The aim of this policy is to ensure that you are confident that you can raise any matter with Glow Education Project that concerns you in the knowledge that it will be taken seriously, treated as confidential and that no action will be taken against you.

You are encouraged to use the procedure set out below if you have any concerns at all about wrongdoing at work, including any criminal offence, a failure to comply with legal obligations, a miscarriage of justice, a health and safety danger, an environmental risk or a concealment of any of these.

* 1. If appropriate, discuss the matter with your line manager in the first instance. An informal approach to a line manager will be treated as completely confidential.
  2. If the matter requires further investigation, such an investigation will be carried out and you will be informed of the outcome and what, if any, action has been taken.
  3. If you remain unhappy about the speed or conduct of the investigation or the way in which the matter has been resolved, you should refer the matter to a Company director. When your complaint has been investigated, you will be informed of the result and what, if any, action has been taken.

Glow Education Project undertakes that no employee who makes a bona fide report under this procedure will be subjected to any detriment as a result, in accordance with section 47B of the Employment Rights Act 1996. In the event that you believe you are being subjected to a detriment by any person within Glow Education Project as a result of your decision to invoke the procedure you must inform the Senior Manager or CEO immediately and appropriate action will be taken to protect you from any reprisals.

If it should become clear that the procedure has not been invoked in good faith, for example for malicious reasons or to pursue a personal grudge against another employee, this will constitute misconduct and will be dealt with in accordance with the terms of Glow Education Project’s disciplinary procedure.

Glow Education Project is keen to hear of any concerns that you may have about wrongdoing at work and encourages you to use the procedure described above wherever possible.

Glow Education Project recognises there may be matters that cannot be dealt with internally and external authorities will need to become involved. Where necessary Glow Education Project reserves the right to make such a referral without your consent.

**Policy updated: November 2022**