

Avado's Guide for and Commitments to Whistleblowing

In this Policy, **Avado** means Avado Group and its subsidiaries, namely Avado Learning Limited, Avado Apprenticeships Limited, and FastFutures Limited.

What does this policy cover, and who is covered?

The purpose of this guide is to encourage a culture of transparency and accountability within Avado, ensuring individuals feel comfortable reporting concerns and that Avado takes appropriate action to address them. The Guide also assists in the prevention of illegal or unethical activities from occurring and can ultimately protect the interests of the organisation, its employees and stakeholders.

Anyone engaged by Avado – those employed by, contracting for, consulting with, officers of, interns with, and on a casual / agency basis – is invited to make use of this important Guide and set of commitments.

Our Guide to Whistleblowing sets out what you should do if you have reason to believe that something dangerous, unlawful or unethical is going on at Avado and it is affecting (or risks affecting) you or anyone else. It also provides a confidential and protected channel for all affected persons to raise their concerns about wrongdoing. When you report these kinds of concerns, this is called whistleblowing.

This Guide is also for actions regarding or taken by third parties, such as suppliers, service providers and clients, and the same procedural guidance applies in these instances.

Avado is committed to operating, to the highest standards of integrity at all times. However, any organisation can occasionally be affected by conduct that is dangerous, against the law or breaches ethical or professional codes. Please follow the procedure outlined within this Guide to report any concerns that you have about this kind of conduct, as soon as reasonably possible, so that we can take the necessary action to address these concerns as quickly as possible.

Your concerns will always be taken seriously, and thoroughly investigated. There will be no reprisals for individuals who bring these concerns to our attention – we value and respect all such reports and those who make them to us. We all play an important role in ensuring that our business and everyone working here and with us acts professionally, lawfully, and appropriately.

What sort of activities are typically considered relevant to whistleblowing?

This is not an exhaustive list, but the types of concerns you may want to raise with us by whistleblowing could include:

- Any activity you suspect is criminal;
- Any activity you suspect puts health and safety at risk;
- Any activity you suspect may damage the environment;
- Any activity you suspect breaches our Guides for and Commitments to bribery and corruption;
- Any failure to comply with legal or regulatory obligations;
- Any failure to meet professional requirements;
- Any attempt to conceal one or more of these activities.

Please feel free to confidentially speak to Avado's [People Experience Team](#) if you are unsure whether something that you are concerned about is covered by this policy.

Bullying or harassment

If your complaint is about the behaviour of others towards you, our problem solving at work guides are available to you, as these types of behaviour are not covered by this whistleblowing policy.

Confidentiality and anonymity

If you would prefer to keep your identity anonymous, we will do all that we can to ensure that you retain your anonymity, and the confidentiality of your concerns as far as possible. However, we would always encourage you to raise concerns openly because it is not always easy to manage and to investigate anonymous reports, especially because:

- If we are unable to ask you for clarification for further details, we may struggle to clarify and find evidence to support your allegations and/or reach an informed conclusion;
- We risk missing critical evidence or opportunities to gather important supporting information, or identify helpful witnesses, because we may simply be unaware of their existence, in spite of our best efforts to uncover them.

If we need to disclose your identity to others as part of the investigation, we will always discuss with you beforehand both our desire and our clear reasons for wishing to identify you. We will protect you from reprisals, and you can read more about how we do this and what rights you have below.

We protect whistleblowers.

There are no reprisals for mistakes or if following our investigations, (which we will always conduct thoroughly and conscientiously), we conclude that there has been no breach of law, policy or unethical conduct. However, to qualify for protection, the disclosure must, in the **reasonable belief** of the worker making the disclosure, show that one or more of the following events has happened, is happening or is likely to happen and that it is in the public interest to make the disclosure:

- A criminal offence
- Failure to comply with any legal obligation
- Miscarriage of justice
- Danger to health and safety of any individual
- Danger to the environment, or,
- Deliberate concealment of any of any of the above.

If at any time, you do not feel that you have been fairly or properly treated by us in the handling of your concern, we ask that you inform us immediately. You should inform the **People Experience Team** in the first instance, and if you are not satisfied with the outcome of that, you should follow the process set out in our guides to problem solving at work.

We also protect whistleblowers from others, so where a whistleblower reports to us that they have been treated inappropriately by others, (including having received threats for raising their concerns), we will take disciplinary action against those individuals. The consequences of us taking this action could include dismissal of such individual(s) for gross misconduct. Whistleblowers may also be entitled to take legal action against those individuals. The entity does not tolerate any form of retaliation against the whistleblower.

If you would like more information about your rights as a whistleblower – a status which is protected by the law – and how you are entitled to be protected, you can contact Public Concern at Work, which is an independent charity offering a confidential helpline on 020 7404 6609 or visit www.pcaw.org.uk.

Whistleblowing to others outside of Avado

Our Guide covers the process for raising, investigating, and resolving wrongdoing within Avado. The whistleblowing procedure that we have carefully put in place has been designed to ensure that to the best of our ability, we are able to resolve any concerns raised and to protect you as part of this process.

We recognise that potentially and in exceptional circumstances, you might wish to involve an external body – for example, an industry regulator or the abovementioned Public Concern at Work organisation. However, we enjoy a high-trust organisational culture at Avado, and we are guided by our values of Accountability, Ambition, Care, Empowerment and Transparency. As such, whilst we would fully support your decision to involve an external party, we do believe that we are equally able to resolve your concerns internally.

Involving the press/media

Our intentions would always be to do everything we can to assist in resolving situations. Unfortunately, there are times when organisations' situations have been inflamed by the involvement of the press or media, to the extent of significantly hampering evidence collection and a meaningful investigation. We would therefore prefer to avoid involving the media before or during an investigation. By way of guidance, we ask that you have taken all reasonable steps to assist us in dealing with the matter internally or even with an external regulator, before involving the press or media. And we would also always encourage you to seek thorough advice from a lawyer or from Public Concern at Work before you involve the press/media.

Procedure for raising a whistleblowing concern.

In the interest of getting to an investigation promptly, and reducing any unnecessary bureaucracy, we try to keep our procedure simple:

- 1. Raise the concern with your manager either verbally or in writing.**
 - a. We would always encourage you to put this in writing.
 - b. If you would prefer not to discuss your concerns with your manager for any reason, please contact the People Experience Team.
 - c. You will need to explain that you are raising your concern under the Avado Guide and Commitment to Whistleblowing.
 - d. Remember to set out all the key facts, including names of those involved and relevant dates where applicable.
- 2. You will be invited to a meeting at which you can discuss your concerns confidentially.**
 - a. Sometimes such matters can be distressing, and/or the procedure can be daunting or overwhelming; whilst we will do all that we can to manage this with you, you are welcome to bring a current work colleague with you (or a trade union representative, if you are a member of a trade union.) Any person accompanying you will be asked to observe the same strict confidentiality that you are asked to observe.
- 3. Following the meeting, we will investigate the matters raised and we may request that you come to additional meetings to assist us in that investigation.**
 - a. We may at this point also involve an external party for specialist support, such as a regulator or legal advisor.
 - b. During the investigation, you will be updated as regularly as reasonably practicable.
 - c. Should any legal advice lead us to increasing the level(s) of confidentiality surrounding all or any part of an investigation, we will make you aware of this as quickly as possible. We will, however, always endeavour to reassure you through this.



Following our investigation, you will be informed – in as much detail as possible / legally permissible – of the outcome(s). If you are not satisfied with the outcomes or our approach to the investigation, you are invited to write your concerns to Avado's Chief People Officer or Chief Executive Officer.

In the event that your concern(s) relate(s) to the actions of either of these individuals, you are invited to write instead to the Avado Group Chairperson.

It is your legal right to make a report with the Financial Conduct Authority if you feel unsafe to do so in the workplace, A report can be made on FCA website [here](#)

Document Control

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Unless stated within the body of this document, the owner is responsible for maintaining document control and facilitating compliance; as well as the management of review, updates and changes.

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Revision History

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Document Reviews

This document has been reviewed for QC purposes by the following, in addition to those on the 'approvers' list.

Version	Date	Name	Title / Role
V2	2019-09-26	Sam Sawyer	Chief Quality officer
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V3	2021-02-22	Dean Corbett	Chief People Officer
V3	2022-03-15	Keith Harvey	Head of Group Compliance
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Approvals

This document requires the following approvals for implementation and / or for any change in content.

Version	Date	Name	Title / Role	ApprovalStatus (Pending/Approved)
V2	2019-09-26	Mark Creighton	Chief Executive Officer	Approved
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V4	2023-03-23	Cristina Montans	Chief People Officer	Approved
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