



INSPIRED EDUCATION HOLDINGS LTD.
("INSPIRED")

WHISTLEBLOWING POLICY

This is a Group wide policy. All staff, workers, employees, contractors, freelancers and Directors within the Inspired Group of companies must comply with this and any other Group policies.

1. Version

Version	Date issued	Author	Revision description
1.0	20 Jul 2021	Alex Clement	Draft policy
2.0	29 July	Guy Youll	Draft Policy
3.0	3 rd August	Patricia Sarrais	Data Protection
4.0	06 August	Guy Youll	General Updates
5.0	26 August	Guy Youll	General Updates

2. Introduction

The Inspired Whistleblowing Policy ("The Policy") sets out the Group's policy and procedure on disclosing malpractice (otherwise known as "whistleblowing"). The whistleblowing policy is intended to act as a deterrent to fraud or other corruption or serious malpractice. It is also intended to protect the Group's business and reputation.

This policy is not a replacement for School Safeguarding Policies and procedures which will remain in force and fully applicable.

This Policy is drafted under the UK Data Protection Act 2018, the Directive (EU) 2019/1937 of 23 October 2019 (the "Whistleblower Directive") and the General Data Protection Regulation (Regulation (EU) 2016/679) ('GDPR').



3. Audience and scope

This policy statement applies to all permanent and temporary employees, agents and contractors. It is intended to complement statutory protection and local policies and, for the avoidance of doubt, statutory rights will not be affected in any way by this policy.

For the purposes of this policy, the reporting employee is also referred as “*whistleblower*” and the reported person or persons as “*person(s) concerned*”.

4. Policy Statement and Objectives

In its pursuit of excellence, Inspired is committed to the highest standards of openness, honesty and accountability, and takes all malpractice very seriously, whether it is committed by an employee, supplier, client, competitor or contractor. Inspired believes that a culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do. The objectives of this policy are to:

- To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected wherever possible;
- To provide staff with guidance as to how to raise those concerns; and
- To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

This policy statement applies to all permanent and temporary employees, agents and contractors.

5. Policy Summary

Employees will usually be the first to know when someone inside or connected with Inspired Group is doing something illegal, dishonest or improper, but may feel apprehensive about voicing their concerns. Inspired Group does not believe that it is in anyone’s interests for employees with knowledge of wrongdoing to remain silent.

We wish to encourage a working environment where employees feel comfortable about highlighting malpractice. If you have reasonable concerns or suspicions that malpractice is taking place or is likely to take place within our work place, we would encourage you to raise this in accordance with the local processes in plan and/or policy below. We believe everyone should feel able to disclose concerns and ‘**speak up**’ (whistleblow) safe in the knowledge that the issue will be investigated, with no adverse impact on themselves. This whistleblowing procedure has been set up to give everyone this comfort if you believe that there has been or continues to be a serious malpractice or wrongdoing, which the company should be aware of

The following examples demonstrate what we mean by serious malpractice:

- Fraud, corruption, bribery or other malpractice which could lead to a financial loss to the Group
- Criminal offences, eg. theft, substance abuse, etc
- Breaches relating to the accuracy or integrity of the Group’s financial statements



- Failure to comply with legal obligations
- Creating or ignoring a serious risk to safeguarding, health & safety, or the environment
- Someone's health and safety is in danger
- Actions which are intended to conceal any of the above

If you become aware of any such activities or other possible malpractices and do not feel that you can raise this to your line manager or through the normal routes or believe that due to serious nature of the issue it is not appropriate, you are encouraged to follow the process set out below which is called **Whistleblowing**. It will not always be clear that a particular action falls within one of these categories and so you will need to use your own judgement. However, if you believe the matter to be serious, Inspired would prefer you to report your concerns by speaking up rather than keep them to yourself.

In raising a concern through this process, Inspired does not expect you to have absolute proof of any malpractice that you report, however, you will need to be able to explain the reasons for your concern and you must have reasonable grounds on which to base any allegation related to the types of examples listed as serious malpractice above. Inspired will not tolerate spurious, abusive, vexatious or malicious allegations and disciplinary action may be taken against you, under relevant disciplinary processes.

6. SPEAKING OUT PROCESS

Please note that this Whistleblowing process is not a replacement for any grievance, appeal, safeguarding or any local policies or processes. Any grievance about you personally should be raised under a grievance procedure in the first instance and please speak to your line manager or contact your local HR department for further information about this. The following process should only be followed if you have reasonable grounds of serious malpractice of wrongdoing.

Step One – Raising a Concern (Whistleblowing)

The first step in most instances should always be to follow any local policies and procedures that may exist with regards to raising a concern or safeguarding issue. Typically, in the first instance, you should raise your complaint with your Line Manager, who will then raise the matter, confidentially, with the Head of Department or relevant Director, who will request a meeting with you in order to ascertain the key facts of the complaint.

If you are not comfortable reporting your concern to your line manager, or anyone else through any existing policy or process that exists, or wish to raise your concern anonymously, you should raise your concerns via our confidential 24-hour Hotline known as our 'whistleblowing' Hotline, which is an independent reporting channel. The service is provided by an independent third party company, Safecall, so you can be assured of confidentiality at all times. Details on how to contact the Hotline are as follows:

- Logging on to www.safecall.co.uk/report, and sending a confidential report in your own language by typing the details into the message boxes.

OR



- Dialling the in-country phone number on the list attached to this policy as Annex I. You will be able to speak to a specially-trained person (English speaking), and/or request the use of a translator if required.

This reporting channel will ensure the confidentiality of the identity of the reporting persons and others mentioned in the report.

However is strongly recommended that where possible anyone and where comfortable to do so, individuals give their names and details to enable Inspired to conduct a thorough investigation.

Step Two – Recording of the details

If you report your concerns via the **Whistleblowing Hotline**, you will be given a unique case number which you need to keep safe in order to receive feedback. Please provide as much information as you are able and include:

- The date of your report;
- Your name, work location/school and your line manager;
- Details of the suspected malpractice, including: dates, times, people, places and location.

Step Three – Investigating the details

Once your concern has been reported to our “whistleblowing Hotline”, your concern will be escalated to Inspired Chief HR Officer, or other appropriately nominated and impartial individual who will act on it without compromising any individual. Or if you have raised your concern to your Head of Department or relevant director, this will trigger a numbers of steps to ascertain the details directly with yourself in line with the current processes.

In all cases, Inspired will endeavour to acknowledge receipt of your concern within 5 working days.

Preliminary enquiries will be made by an independent senior manager as confidentially as possible. If it is determined that a fuller investigation is necessary, this will proceed either with further internal investigations or by referral to the appropriate external body dependent upon the nature and seriousness of the report.

The investigation process may include interviews with you and with anyone who might be involved in the suspected malpractice. Our aim is to ensure that any investigation is as proportionate and independent as possible, whilst always maintain confidentiality and anonymity where possible.

Step Four – Taking Action

A high level summary record of any incident registered through Whistleblowing will be held by the Chief HR Officer and Chief Financial Officer.

Possible results of the investigation process may include:

- No further action



- Disciplinary action (under the Global and local Disciplinary Policies)
- Further investigation by an external authority only where appropriate

Subject to any legal and confidentiality constraints, Inspired will communicate the findings of the investigation to:

- The person raising the report or issue;
- The individual(s) under investigation (if appropriate); and
- If appropriate, those members of the Group's management or external authorities who need to consider whether action should be taken on the basis of the findings.

Cases relating to suspected criminal activity, including but not limited to fraud, would be reviewed by the Chief Financial Officer and the Chief HR Officer to decide whether they should be referred to the Police or other relevant authority.

If you are unhappy about the outcome of an investigation, you have the option to make a further report which will be investigated but only if there is good reason to do so or there is new evidence and not for any inappropriate reason listed in section 5.

7. Confidentiality and Anonymity

This policy encourages everyone directly or indirectly employed by Inspired to put their name to any disclosure they make to avoid anonymous disclosures where serious malpractice is suspected. It is recommended that all issues raised through this process are done openly because Concerns expressed anonymously are sometimes less easy for Inspired to investigate thoroughly.

Inspired will guarantee the protection of your identity all times. Unless there are exceptional circumstances, the reported person(s) has the right to know about any Whistleblowing issue raised, but your identity as a reporting employee won't be disclosed to the reported person under any circumstance unless you have expressly consented or such disclosure is required by law. This duty also applies to any information from which the identity of the reporting person can be deduced.

The records will be kept confidential and Inspired will guarantee the prohibition of retaliation against the reporting employee in any form, including threats or attempts of retaliation.

In addition to providing protection to reporting employees, Inspired will also implement measures for the protection of 'persons concerned' who are referred to in a report or public disclosure as persons to whom the breach can be attributed. These persons will have guaranteed the right to an effective remedy, a fair trial, the presumption of innocence, and the rights of defence, including the right to be heard and the right to access the file. The same protection of the identity of reporting persons must also be extended to the protection of the identity of 'persons concerned.'

The reports related personal data will be shared only with those who need to have access to the data for purposes of investigating the allegations or for taking follow-up measures under the appropriate confidentiality and security safeguards.



8. Right of Information and right of access

Your right of information of any investigation and any action taken in relation to your concern as well as the possible recipients of the report will be guaranteed at all times.

You can also exercise your right to access and rectify incorrect, incomplete, or outdated personal data, or to have your data erased.

Your rights may be only limited to ensure the protection of the rights and freedoms of others affected by the reporting as well as when its processing is required to comply with a legal obligation. Persons concerned should have the right to object to the processing of their personal data in the context of a report, but with the limitation of Inspired's or a third party's legitimate interest.

9. Protecting Against Victimisation

If any person raises a malpractice concern, this will be taken seriously and such person(s) will be treated fairly and with discretion. All staff have a responsibility to ensure that their colleagues are not subjected to detrimental treatment as a result of disclosing malpractice. Where an individual has disclosed malpractice and is then penalised in some way for doing so, both we, as the employer, and the person taking any detrimental action, can be liable. This means that if any individual penalises a colleague who has disclosed malpractice, the individual may be personally liable to their colleague and may have to pay compensation personally.

10. Complaints

If you are unhappy with the outcome of an investigation, you should submit another report explaining why this is the case. Your concern will be investigated again if there is a good reason to do so.

11. Relevant data

We will not process more personal information than necessary. Inspired will only collect the relevant information to the particular case, so it will carry out an initial check of the information reported and only the relevant data will be kept.

12. Keeping records

Records will be kept for no longer than it is necessary and proportionate to comply with the requirements imposed by the Whistleblower Policy.

Inspired will take all reasonable technical and organisational measures to preserve the security of personal data that are part of the Whistleblower report. These records will be protected from accidental or unlawful destruction or accidental loss and unauthorised disclosure or access.



13. Sharing of Data

Personal data is shared only with those who need to have access to the data for purposes of investigating the allegations or for taking follow-up measures. Anyone receiving such data should ensure that it is handled confidentially and subject to data security safeguards.

Considering Inspired's structure as a multinational organisation, the data in that report may need to be shared among a wider group of recipients, including outside United Kingdom or EU if such communication is necessary for the investigation of the report, and in this case, the data transfer restrictions will be taken into account and Inspired will take the appropriate measures to verify if the data can be shared under the appropriate safeguards.

14. Status of this policy

This policy is not part of any contract of employment and does not create contractual rights or obligations. It may be amended by Inspired at any time.

If you require guidance or support with the details of this policy or compliance with it, or are unsure on any part of the policy, please contact your regional CEO and/or the Group Head of HR.



SCHEDULE 1 – SAFECALL CONTACT DETAILS

Country	Phone Number	Free phone Yes or No
Australia	1800 312928	Yes
Bahrain	8000 4264	Yes
Belgium	00 800 72332255	Yes
Colombia	01800 9448040	Yes
Costa Rica	08000 440128	Yes
Indonesia	001 803 440884	Yes
Indonesia (if PT Telekom)	007 803 440884	Yes
Italy	00 800 72332255	Yes
Kenya	+44 191 516 7764	No
Latvia	00 800 7233 2255	Yes
Lebanon	+44 191 516 7756	No
Mexico	01800 1231758	Yes
New Zealand	00 800 7233 2255	Yes
Oman	800 72323	Yes
Panama	00800 0449854	Yes
Peru	0800 77601	Yes
Portugal	00 800 72332255	Yes
South Africa	0800 990243	Yes
Spain (inc. Canary Is.)	00 800 72332255	Yes
Switzerland	00 800 72332255	Yes
UAE	8000 4413376	Yes
UK	0800 9151571	Yes
Vietnam (Mobifone)	121 020036	Yes
Vietnam (VNPT)	120 11157	Yes
Vietnam (Viettel)	122 80725	Yes

Report online at

www.safecall.co.uk/report