

Whistleblowing Policy

Introduction

Active Swim aims to wish to conduct all business with integrity. We recognise that training actively encourages the reporting of any working practices that are dangerous, illegal, unethical or fraudulent and to protect those reporting these. We understand that at times things go wrong and mistakes can be made. A culture of reporting and transparency in such instances is encouraged so that immediate action can be taken to remedy any mistakes or wrong-doing and that policies, procedures and practices can be amended to ensure future appropriateness.

Scope of Policy

Whistleblowing is making a disclosure that is in the public interest. This may include but not exclusively:

- putting someone's health and safety is in danger
- damaging the environment
- the organisation isn't obeying the law
- covering up wrongdoing

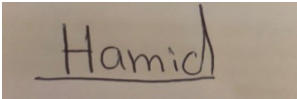
A whistleblower is protected by the law and will not be treated detrimentally or dismissed as long as the reporting is in good faith, not malicious or for personal gain. A whistleblower is not expected to investigate any potential wrongdoing but to refer it to *Active Swim* for further investigation. Total Courses are responsible for the investigation of the concerns and reporting concerns to the SEQ.

Procedure

1. Where a whistleblowing incident occurs then it should be reported to the Centre Key Contact. The following information will be required:
 - a. Course name, venue and dates, where applicable
 - b. Details of those involved
 - c. What the incident being report is
 - d. What action if any was taken at the time
 - e. Your name and contact details
2. All whistleblowing will be handled confidentially and ensure the protection of the person whistleblowing.
3. All reports of potential wrongdoing will be treated seriously.
4. The report will be promptly and fairly investigated by a named investigating officer, who will have no previous involvement with the incident.
5. The investigating officer will carry out an investigation. Total Courses will ensure that any actions are complied with. Total Courses will ensure that SEQ are informed of the decision and issues.
6. The length and scope of the investigation will depend on the subject matter of the whistleblowing. A specific time frame is not stated given the potential diversity of reports.
7. Once the investigation has been completed, the whistleblower will be informed in writing of the outcome, together with our conclusions and decisions in a timely manner. However, the need for confidentiality may mean they are not given specific details of the investigation or actions taken.
8. Total Courses may on completion of the investigation, will report the matter to SEQ within five working days.
9. If, on conclusion of the above stages, the whistleblower considers that appropriate action has still not been taken, they may then report the matter to the proper authority in good faith. There are a number of prescribed external bodies or persons to which qualifying disclosures may be made. These include HM Revenue & Customs (HMRC), The Financial Services Authority (FSA), Office of Fair Trading (OFT), Health & Safety Executive (HSE) and the Environment Agency.

Report any concerns to:
Mr H Anwar
10 Burgundy Court
31 Arla Place
Ruislip
HA4 0GD

hamid@activeswim.co.uk

A rectangular photograph of a piece of light-colored paper with the name 'Hamid' written in dark ink. The name is underlined.

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