The Inspire Group
Whistleblowing Policy
2026/27

Whistleblowing

Key Points

The Whistleblowing Procedure sets out the framework for dealing with allegations of illegal and improper conduct.

The Inspire Group is committed to the highest standards of transparency, probity, integrity and accountability.

This procedure is intended to provide a means of making serious allegations about standards, conduct, financial irregularity or possible unlawful action in a way that will ensure confidentiality and protect those making such allegations in the reasonable belief that it is in the public interest to do so from being victimised, discriminated against or disadvantaged.

This procedure does not replace other policies and procedures such as the complaints procedure, the Grievance and Harassment and Bullying Policies and other specifically laid down statutory reporting procedures.

This procedure is intended to ensure that the The Inspire Group complies with its duty under the Public Interest Disclosure Act 1998.

Scope

This procedure applies to all Inspire Group employees, including Associates and contractors.

This procedure does not replace other Inspire Group policies or procedures. For example, if an employee has a grievance about their working conditions they should use The Inspire Group Grievance Policy or, if they felt that their manager or a colleague was treating them unfavourably, they should use The Inspire Group Harassment and Bullying Policy. Similarly if an employee has a concern about the conduct of a fellow employee in the working environment (e.g. that they are not treating colleagues with respect) they should raise these with their line manager, or if that is not possible, with the CEO or COO or CFO.

This procedure applies to, but is not limited to, allegations about any of the following:

- Conduct which is an offence or breach of the law
- Alleged miscarriage of justice
- Serious Health and Safety risks
- The unauthorised use of public funds
- Possible fraud and corruption ? Sexual, physical or verbal abuse, or bullying or intimidation of employees, customers or service users
- Abuse of authority
- Other unethical conduct

Reporting

Contact Details for Reporting: (in writing) The Inspire Group, Trafford Secretarial Services, Loxley House, 11 Swan Rd, Lichfield, Staffordshire, United Kingdom, WS13 6QZ.

The Inspire Group recognises that the decision to make an allegation can be a difficult one to make. However, whistleblowers who make serious allegations in the reasonable belief that it is in the public interest to do so have nothing to fear because they are doing their duty either to The Inspire Group and/or to those for whom the The Inspire Group or they are providing a service.

The Inspire Group will take appropriate action to protect a whistleblower who makes a serious allegation in the reasonable belief that it is in the public interest to do so from any reprisals, harassment or victimisation.

Confidentiality

All allegations will be treated in confidence and every effort will be made not to reveal a whistleblower's identity unless the whistleblower otherwise requests. However, if the matter is subsequently dealt with through other Inspire Group procedures such as the Disciplinary Procedure.

Similarly, if the allegation results in court proceedings then the whistleblower may have to give evidence in open court if the case is to be successful.

The Inspire Group will not, without the whistleblower's consent, disclose the identity of a whistleblower to anyone other than a person involved in the investigation/allegation.

Anonymous Allegations

This procedure encourages whistleblowers to put their name to an allegation wherever possible as anonymous allegations may often be difficult to substantiate/prove. Allegations made anonymously are much less powerful but anonymous allegations will be considered at the discretion of the CEO/ COO/CSO

In exercising discretion to accept an anonymous allegation the factors to be taken into account:

- The seriousness of the issue raised
- The credibility of the allegation; and
- Whether the allegation can realistically be investigated from factors or sources other than the complainant

Untrue Allegations

No disciplinary or other action will be taken against a whistleblower who makes an allegation in the reasonable belief that it is in the public interest to do so even if the allegation is not substantiated by an investigation. However, disciplinary action may be taken against a whistleblower who makes an allegation without reasonable belief that it is in the public interest to do so (e.g. making an allegation frivolously, maliciously or for personal gain where there is no element of public interest).

Procedure for Making an Allegation

It is preferable for allegations to be made to an employee's immediate manager to whom they report. However, this may depend on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if the whistleblower believes that management is involved it would be inappropriate to raise it directly with them. The whistleblower may then make an allegation direct to any of the following:

- The CEO
- The COO
- The CSO

If either of the above receive an allegation he/she will consider the allegation and may discuss with either the leadership team. The line manager (or either/or both) of the above, after consideration, will discuss with the whistleblower and if they wish to proceed with the allegation will be investigated.

Allegation

Whether a written or oral report is made it is important that relevant information is provided including:

- The name of the person making the allegation and a contact point.
- The background and history of the allegation (giving relevant dates and names and positions of those who may be in a position to have contributed to the allegation);
- The specific reason for the allegation. Although someone making an allegation will not be expected to prove the truth of any allegations, they will need to provide information to the person they have reported to, to establish that that there are reasonable grounds for the allegation.

Someone making an allegation may be accompanied by another person of their choosing during any meetings or interviews in connection with the allegation. However, if the matter is subsequently dealt with through another procedure the right to be accompanied will at that stage be in accordance with the relevant procedure.

Action on receipt of an Allegation

The line manager will record details of the allegation gathering as much information as possible, (within 5 working days of receipt of the allegation) including:

- The record of the allegation:
- The acknowledgement of the allegation;
- Any documents supplied by the whistleblower

The investigator will ask the whistleblower for his/her preferred means of communication and contact details and use these for all communications with the whistleblower in order to preserve confidentiality.

If the allegation relates to fraud, potential fraud or other financial irregularity the leadership will be informed within 5 working days of receipt of the allegation. The leadership will determine whether the allegation should be investigated and the method of investigation.

If the allegation discloses evidence of a criminal offence it will immediately be reported to the Leadership team and a decision will be made as to whether to inform the Police. If the allegation concerns suspected harm to children the appropriate authorities will be informed immediately.

If the issue is around suspected harm to vulnerable adults, the Vulnerable Adults policy, the Mental Capacity Act Policy and the Deprivation of Liberty and Safeguarding Policies should be referred to.

Timetable

- An acknowledge the allegation in writing within 10 working days with
    - An indication of how the The Inspire Group propose to deal with the matter
    - An estimate of how long it will take to provide a final response
    - An indication of whether any initial enquiries have been made
    - Information on whistleblower support mechanisms
    - Indication whether further investigations will take place and if not, why not

Where the allegation has been made internally and anonymously, obviously the Inspire Group will be unable to communicate what action has been taken.

Support

The Inspire Group will take steps to minimise any difficulties which may be experienced as a result of making an allegation. For instance, if a whistleblower is required to give evidence in criminal or disciplinary proceedings The Inspire Group will arrange for them to receive advice about the procedure and advise on the support mechanisms that are available.

The Inspire Group accepts that whistleblowers need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform those making allegations of the outcome of any investigation.

Responsibility for the Procedure

The CEO and leadership team have overall responsibility for the operation of this Procedure and for determining the administrative processes to be followed and the format of the records to be kept.

Monitoring

A Register will record the following details:

- The name and status (e.g. employee) of the whistleblower
- The date on which the allegation was received
- The nature of the allegation
- Details of the person who received the allegation
- Whether the allegation is to be investigated and, if yes, by whom
- The outcome of the investigation
- Any other relevant details

The Register will be confidential and only available for inspection by the leadership team.

The CEO will report annually to the leadership team on the operation of the Procedure and on the whistleblowing allegations made during the period covered by the report. The report will be in a form which does not identify whistleblower

Declaration
On behalf of The Inspire Group we, the undersigned, will oversee the implementation of the Whistleblowing Policy and take all necessary steps to ensure it is adhered to.



Mark Howard
Co Founder & Chief Executive Officer
02/09/26



Steve Clarke
Co Founder & Chief Operating Officer
02/09/26



Alexander Howard
Co Founder & Chief Strategy Officer
02/09/26

POLICY DATE OF REVIEW
02/09/2026
NEXT SCHEDULED REVEIW
01/09/2027