



UK

## Whistleblowing Policy

(Confidential reporting)

<b>Location</b>	Oxford Campus, C/o Activate Learning, Jericho Building, Oxford OX1 1SA
<b>Monitoring</b>	The Principal , all members of staff
<b>Author</b>	Birgit Muller – Office manager
<b>Overall responsibility</b>	Board of Directors
<b>Created</b>	August 2021
<b>Last review date</b>	October 2025
<b>Next review date</b>	July 2026 or as necessary

### 1. Introduction

EM Normandie UK Limited (hereafter 'EMN', 'EMN UK' or 'the school') is committed to the highest standards of transparency, probity and accountability. In line with the Public Interest Disclosure Act 1998 (PIDA), this policy provides a clear framework through which members of the EMN community can raise concerns in the public interest without fear of reprisal or detriment.

EMN encourages a culture of openness where individuals feel confident to raise concerns regarding malpractice, impropriety, or any action that could damage the organisation's integrity.

We will always seek to deal with any concerns raised appropriately, consistently, fairly and professionally.

### 2. Scope of Policy

This policy applies to all members of the EM Normandie UK community, including members of staff, lecturers on service contracts, students and visitor and is designed to enable individuals to disclose information, which is in the public interest, that is to say on a matter of serious wrongdoing, criminal offences, misconduct, breaches of any legal obligations we may have, or other serious concerns regarding the running of the school, that has an impact beyond the individual making the disclosure.

Concerns may be raised by any member of the EMN community.

Where concerns are of a personal nature, these should be raised under the company's relevant *Grievance or Complaint and Appeal Procedures*.

Concerns which could be raised under this policy include but are not limited to,

- financial malpractice and/or impropriety and/or fraud
- failure to comply with a legal obligation or Statutes
- academic or research misconduct
- dangers to Health & Safety or the environment



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- criminal activity or negligence
- improper conduct or unethical behaviour
- attempts to conceal any of the above

### 3. Safeguards

#### Protection

Individuals who raise concerns in good faith under this policy will be protected from dismissal, detriment, or victimisation as a result of their disclosure. Protection applies where the disclosure is made in accordance with this policy and with the reasonable belief that the disclosure is in the public interest.

Malicious, vexatious or knowingly false allegations may result in disciplinary action and/or could give rise to legal action by the company and/or by any person who has been wrongly accused.

#### Confidentiality

All disclosures will be treated in a confidential and sensitive manner and EMN will seek to protect the identity of the person making the allegations. However, we may not be able to do so, if this hinders or frustrates an investigation or if a statement or other evidence is required.

### 4. Anonymous Allegations

Concerns expressed anonymously may be considered at the discretion of EMN. In exercising this discretion, EMN will take into account relevant factors, such as

- the seriousness of the issues raised
- the credibility of the concern
- the likelihood of confirming the allegation from attributable sources

### 5. Procedures for Making a Disclosure

Concerns should be raised in writing as soon as possible with

- the individual's Line Manager or the Principal
- the Office Manager
- the Board of Directors or individual company directors  
(details or company directors are published on our website [www.em-normandie.co.uk](http://www.em-normandie.co.uk) or can be obtained from the Principal or the Office Manager)
- Mrs Stéphanie Person, Head of Legal affairs, EM Normandie France – [sperson@em-normandie.fr](mailto:sperson@em-normandie.fr)
- Mrs Edeline Roy, Head of global HR, EM Normandie France – [eroy@em-normandie.fr](mailto:eroy@em-normandie.fr)

If none of these routes are appropriate, individuals may wish to contact external bodies such as, the Office for Students (OfS), the Health & Safety Executive (HSE) or the Information Commissioner's Office (ICO).

We may consider deliberate violations or breaches of our procedures as acts of serious misconduct which we will investigate following our disciplinary procedure. If such an investigation concluded that action taken by an individual constituted gross misconduct, this could result in summary dismissal.



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## 6. Approaching External Organisations

It is not appropriate for any allegations to be brought to the attention of commercial organisations such as a media outlet, or to publish and/or promote any concerns on social media in the first instance, instead of following the procedures outlined in this policy.

Such actions could jeopardise the opportunity to investigate concerns properly, would negate our promise to deal with matters confidentially and impede our ability to offer the protection this policy envisages.

## 7. Investigating Procedure

EMN will acknowledge receipt of any allegations under this policy within 5 working days.

An initial assessment will be carried out to determine the appropriate course of action. Where a formal investigation is required, an investigating officer will be appointed.

The investigating officer will ensure that an investigation is undertaken as soon as possible after the allegations have been raised. We will seek to carry the investigation as quickly as possible. Due to the sensitive and intricate nature of such allegations, however, and in order to protect the quality of the investigation, this will not be limited in time.

The person making the allegations will be kept informed of the investigation's progress from time to time.

The investigating officer will

- clarify any necessary details regarding the allegation
- inform the member of staff against whom the allegation has been made
- meet with and interview individuals where relevant. Members of staff against whom allegations have been made may choose to be accompanied by a colleague or Union representative during such meetings.
- consider the involvement of any relevant parties, such as accountants, auditors, etc. who may be able to assist with the investigation
- produce a detailed written report outlining the findings of the investigation

The refusal by a member of staff to collaborate with the investigation or to attend interviews and meetings may constitute a disciplinary offence.

The Board of Directors will consider the report and determine what action to take such as, but not limited to, disciplinary proceedings against members of staff, proceedings for breach of contract, etc.

The company reserves the right to refer matters to the police and other relevant organisations, where it believes that a criminal offence may have been committed

The person who has made the allegations will be kept informed of the outcome of the investigation and the action which will be taken. If the person is not satisfied that their concern is being properly addressed, they have the right to raise this with the Board of Directors. The Board of Directors' decision is final and concludes the internal investigation.



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If the individual remains dissatisfied with the outcome of the investigation, they may wish to contact external bodies such as, the Office for Students (OfS), the Health & Safety Executive (HSE) or the Information Commissioner’s Office (ICO). A full list of prescribed people and bodies can be found on the Government Website ([www.gov.uk](http://www.gov.uk)).

**8. Record keeping**

EM Normandie UK will maintain a confidential record of all whistleblowing cases, including investigation reports, minutes of meetings and outcomes.

**Annex 1 - Control table**

Version	v1	Name	Role	Date
Created by :	Birgit Muller		Office Manager	Aug 2021
Approved by :	Miriam Schmidkonz, Principal			
Version	v2	Name	Role	Date
Amended by :	Birgit Muller		Office Manager	Feb 2023
Changes approved by :	Miriam Schmidkonz, Principal			
Version	v3	Name	Role	Date
Amended by :	Birgit Muller		Office Manager	Aug 2024
Reviewed, no changes				
Changes approved by :	Miriam Schmidkonz, Principal			
Created by :	Birgit Muller		Office Manager	Oct 2025
Approved by :	Miriam Schmidkonz, Principal			