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Whistle Blowing Policy

Whistleblowing Policy

General

SAIGE requires associates and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. All staff must practise honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations including relating to regulatory bodies, such as Ofqual. The concept of whistleblowing itself can be difficult for staff, therefore to support you with this, or if you think you have something to report but are not sure how, or are worried about anything, please contact www.protect-advice.org.uk.

A whistleblowing concern could be an action committed by an individual, a team, or by a third party, in connection to SAIGE, which you feel could be one of the following:

- environmental damage
- health and safety risks
- malpractice such as:
 - actions contrary to any SAIGE policy
 - actions contrary to any regulations set by a regulatory body to which SAIGE is subject
 - financial malpractice or maladministration

or

- concealment of information relating to any of the above.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases you should refer to the relevant SAIGE HR policy.

Reporting Responsibility

It is the responsibility of all staff, including associates, to comply and to report any actual misconduct or suspected misconduct in accordance with this Whistle Blowing Policy. Where staff are outside of SAIGE but are working in partnership with the company – for example, associate staff at our centres – then they should also follow this policy.

Reporting Misconduct

SAIGE operates an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, this will be your supervisor who is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the relevant head of your department or the Chief Executive Officer (CEO).



Supervisors and managers are required to report suspected misconduct to the CEO, who has specific and exclusive responsibility to investigate all reported misconduct.

For suspected fraud, or when you are not satisfied or uncomfortable with following SAIGE's open door policy, individuals should contact either the Chair, or the CEO, directly.

Allegations against senior managers (officers)

Allegations against senior managers are taken extremely seriously. SAIGE is a public facing company and does not support misconduct of any kind; this is true of all staff but senior managers must take a higher level of professional responsibility and accountability. Given that the company is also regulated by official bodies, over and above that of normal regulation and compliance requirements in the UK, then matters which might refer to any form of actual, or potential, misconduct in relation to these regulatory matters are of the utmost importance.

Any member of staff should report such misconduct, of a senior manager, to either of the Chief Executive Officer. If the issue refers to the CEO then this matter should be reported to the Chair. If the report regards the Chair then the report should be made to one of the independent Non-Executive Directors on the Board of SAIGE (contact details are available from your line manager).

If the report is against the Responsible Officer (RO) it should be made directly to the Chair, as this role is undertaken by the CEO.

Regulatory Compliance, Accounting and Auditing Matters

The CEO shall notify the Board of any such reports and work with the Board until the matter is resolved. The Board of Directors shall address all reported concerns or complaints regarding regulatory compliance matters, corporate accounting practices, internal controls or misconduct of senior executives.

What to report?

There is no requirement for you to provide any evidence at the stage of reporting the issue or concern under this policy. However, you may need to provide documents and emails that you have as part of the investigation. For general guidance the following is useful to include in your email:

- the organisation or individual's name



- what is the suspected wrongdoing
- who is involved
- how long it has been going on
- where this is happening
- what is the impact
- if you have any supporting documents or evidence you can share with the investigator.

Any of the details you share with us will be stored securely and we limit access to this information wherever possible.

Investigation

Upon receipt of a whistleblowing report, SAIGE will:

- arrange a meeting with you as soon as possible. You may bring a colleague or a union representative to any meetings (they must respect the confidentiality of your disclosure and any subsequent investigation)
- carry out an initial assessment to determine the scope of any investigation.

SAIGE will

- inform you of the outcome of our initial assessment
- conduct additional meetings with you as may be necessary to obtain further information or to progress the investigation.

SAIGE may appoint an investigator or team of investigators (including staff with relevant experience of investigations and/or specialist knowledge of the subject matter). The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

SAIGE will keep you up to date on the progress of the investigation.

Outcome

Where the investigation finds evidence of wrongdoing, by an individual or individuals, SAIGE may utilise its staff disciplinary processes and any proven allegations may result in disciplinary action (up to and including dismissal for an employee) or termination of the contract between SAIGE and a third party (eg an associate).



External Communications

The purpose of this policy is for SAIGE to enable its employees, associates and other stakeholders to alert SAIGE to any (including potential) wrongdoing within the company. You should not normally find it necessary to alert anyone outside of SAIGE.

This is important as external disclosure could be contrary to your obligations of confidentiality to the company under your terms of employment and it could also prejudice any investigation that we and/or an external body may decide to undertake in the future.

False Allegations

Although SAIGE does not expect the whistleblowing procedure to result in the reporting of false accusations against a member of staff, this is nevertheless a possibility. Deliberately making false allegations against a member (s) of staff of SAIGE are not acceptable and will be treated accordingly. This could include investigation which could subsequently lead to disciplinary action or termination of a contract of services.

Retaliation

More importantly, as a member of staff you are protected by UK law; no member of staff who, in good faith, reports any misconduct shall suffer harassment, retaliation or adverse employment consequences. If you raise an issue or concern confidentially, we will make every effort to protect your identity and will not disclose it without your consent, unless we are required to do so by law or there is a serious risk of health or safety. An employee who retaliates against someone who has reported misconduct in good faith will be subject to disciplinary action, up to and including possible termination of employment. This Policy is intended to encourage and enable all staff to raise serious concerns within SAIGE prior (if necessary) to seeking resolution outside the organisation.



Review

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