

Review Date November 2025
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This policy relates to Let Me Play Ltd, Inspire ATA Ltd and LMP Action C.I.C, known as “LMP Group” or “the company”. The policy applies to all three companies and is the standard by which we adhere to.

Introduction

LMP Group is committed to the highest standards of openness, integrity and accountability in all its activities and is committed to ensuring that no employee should feel at a disadvantage in raising legitimate concerns.

The Company understands that at one time or another, employees may have concerns about activities at work and these concerns are usually easily resolved. However, when these concerns relate to legal breaches, considerable misconduct by another person, other malpractice or unlawful activity impacting on others, employees may be unsure of how to raise the issue.

What is the policy about?

People are at the heart of LMP Group. It’s our aim to create an environment and employee experience, which inspires and encourages our people to do their best work. We spend a significant portion of our lives at work, and we believe it’s really important to make this as enjoyable as possible.

We’re passionate about promoting a culture of openness and inclusivity, where you feel able to discuss concerns that you have, regardless of who and what the concerns are about, and that they will be treated sensitively and taken seriously. We spend a significant portion of our lives at work, and we believe it’s really important to make this as enjoyable and stress-free as possible.

You’ll not be subject to any detrimental or less favourable treatment as a result of raising concerns about wrongdoing or malpractice within the organisation. This policy explains what concerns you can raise and how, it also explains how we will respond to concerns raised.

Who does it apply to?

This policy applies to any employees within LMP Group. No qualifying length of service is required to raise a concern under this policy. Individual managers are responsible for ensuring that this policy is applied within their own area.

What do I need to know or do?

We’re committed to conducting our business with honesty and integrity and aim to achieve the highest possible standards of service and ethical standards in all of our practices.

We expect our people to maintain the same high standards too; however, all organisations face the risk of things going wrong and sometimes malpractice and wrongdoing can take place. We take malpractice and wrongdoing very seriously and aim to prevent and eliminate any wrongdoing or malpractice within the organisation.

We therefore encourage you to raise any concerns you may have about malpractice or wrongdoing within the organisation freely and without fear of suffering a detriment or dismissal to enable us to eliminate and prevent wrongdoing or malpractice. Concerns related to harassment, bullying or personal grievances should be raised through our Grievance Policy.

What is malpractice or wrongdoing?

It's a concern in relation to our organisation's activities where you have information which you reasonably believe tends to show one or more of the following:

- that a criminal offence has been committed, is being committed or is likely to be committed
- that a person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject
- that a miscarriage of justice has occurred, is occurring or is likely to occur
- that the health or safety of an individual has been, or is being or is likely to be endangered
- that the environment has been, is being or is likely to be damaged
- that any of the above malpractices have been, are being or are likely to be deliberately concealed. This applies whether the malpractice has already occurred, is currently in progress, or is likely to happen in the future.

You must reasonably believe that the disclosure is being made in the public interest. It doesn't matter if you are mistaken about your concern, but you must have information that tends to show some malpractice or wrongdoing rather than an opinion or a feeling.

Who to raise a concern with?

If you have any concerns of the types of malpractice or wrongdoing covered by this policy, you should in the first instance make a disclosure to your immediate manager.

If, for any reason, you feel that you cannot tell your immediate manager, you should raise the issue with a more senior manager e.g. Head of / Director.

If you've made a disclosure and are still concerned, or the matter is so serious that you feel you cannot discuss it with those individuals, you should raise the matter with the Managing Director or the Senior Leadership Team.

If your concern is about something in a school or another education establishment, you should follow their whistleblowing policy as well as informing your immediate manager of your concerns.

How to raise a concern

A disclosure of a concern can be made by telephone, in person or in writing (including by email). However, it's preferable for the disclosure to be made in writing so that we can keep an exact record of your concern.

You're not expected to prove the truth of your concern beyond reasonable doubt or provide any evidence; however, you'll generally need to provide the following information as a minimum:

- the nature of the concern
- why you believe it to be true
- the background and history of the concern
- relevant dates where possible

You can raise any concerns anonymously; however, we encourage you to give your name when reporting your concern wherever possible because it may be more difficult

for us to protect your position or give you feedback on the outcome of investigations if you choose to remain anonymous.

You can also choose to raise a concern under this policy alone or with a colleague; however, it's in the interests of all parties to maintain confidentiality once you have raised a formal concern.

How we respond to concerns raised under this policy?

We're committed to ensuring that all disclosures raised in accordance with this policy will be dealt with objectively, consistently, fairly and professionally. Any concerns you raise in line with this policy will be recorded in our Whistleblowing Report Register.

We'll take the time to listen to any issues raised and arrange a meeting as soon possible to discuss your concern (unless the concern has been raised anonymously). The aim of the meeting will be to establish the background and facts in order to help us decide whether and how to carry out any subsequent investigation. We may ask you for further information about the concern raised, either at this meeting or at a later stage.

You may bring a work colleague or trade union representative to any meeting that takes place. Your companion must respect the confidentiality of the disclosure and any subsequent investigation.

After the meeting, we'll decide how to respond. This will usually involve making internal enquiries in the first instance, but it may be necessary to carry out an investigation at a

later stage which may be formal or informal depending on the nature of the concern raised. We'll endeavour to complete investigations within a reasonable time.

We'll keep you informed of the progress of the investigation as it's carried out and when it's completed and give you an indication of the timescale for any actions or next steps that we may take. We cannot inform you of any matters that would breach any duty of confidentiality owed to others.

All concerns raised will be treated as confidential and every effort will be made not to reveal the identity of any individual who raises a concern.

Unless the law requires otherwise, we'll only make disclosures to third parties or other individuals with your consent.

We'll consider any concerns raised anonymously at our discretion, taking into account factors such as the seriousness of the issue raised, the credibility of the concern and the likelihood of confirming the allegation from other sources. However, concerns that are

expressed completely anonymously are much less powerful and are difficult to investigate. It may also be difficult for us to provide you with feedback if you cannot be contacted. If disciplinary or other proceedings follow the investigation, we may need to ask you to come forward as a witness to help us take appropriate action to end the wrongdoing.

Disclosures not covered by this policy

You'll not qualify for protection under this policy if you commit an offence in making the disclosure, or if you disclose a matter that is subject to legal, professional privilege (for example, correspondence between us and our lawyers regarding a specific case).

If your concern relates to your own treatment as an employee, including personal circumstances at work, you should raise it under our grievance procedure instead, unless you reasonably believe that the matter is in the public interest.

Raising your concern externally

The main purpose of this policy is to give you the opportunity and protection you need to raise concerns internally. We expect that in almost all cases, raising concerns internally would be the most appropriate course of action to resolve the issue.

However, if for whatever reason you feel you cannot raise your concerns internally and you reasonably believe the information and any allegations are substantially true and in the public interest, the law recognises that it may be appropriate for you to raise the matter with another approved person, such as a regulator, professional body, or an MP. A list of the relevant prescribed people and bodies that you can raise a concern with is available on the GOV.UK website via the following link:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/510962/BIS-16-79-blowing-the-whistle-to-a-prescribed-person.pdf

We strongly encourage you to seek appropriate advice before reporting a concern to an external person. Public Concern at Work is a leading independent charity whose main objective is to promote compliance with the law and good practice in the public, private and voluntary sectors. They're a source of further information and advice and operate a confidential helpline. ACAS also operate a free confidential helpline that you can contact for advice. The contact details for both organisations are set out in the where can I find more information section below.

Protection and support for those raising concerns

We hope that you'll feel able to voice any concerns freely under this policy. We're committed to good practice and high standards and to being supportive of people who raise genuine concerns under this policy, even if they turn out to be mistaken.

Any individual raising a genuine concern must not suffer any detriment as a result of doing so. If you believe that you have suffered such treatment, you should inform the Managing Director or the Senior Leadership Team.

We'll not tolerate any harassment or victimisation of individuals who raise concerns about wrongdoing or malpractice in the workplace. No employee may threaten or retaliate against an individual who has raised a concern. Any person involved in such conduct may be subject to disciplinary action.

To ensure the protection of all our people and the integrity of our business, those who raise a concern frivolously, maliciously and/or for personal gain and/or make an allegation they do not reasonably believe to be true and/or not made in the public interest may also be subject to disciplinary action.

If you're not happy with the way in which a matter has been addressed or dealt with you should raise it formally using our grievance policy.

Where can I find more information?

- Grievance policy
- Disciplinary Policy

If you have any questions about this policy, please ask your manager.

Protect (was Public Concern at Work) is a source of further information and advice. It also provides a free helpline offering confidential advice on 020 3117 2520. Further information is available on their website at <https://protect-advice.org.uk>

The Advisory, Conciliation and Arbitration Service (ACAS) also has a free helpline that you can contact for further advice. The ACAS telephone number is: 0300 123 1100. The website can be found here: www.acas.org.uk

If you're a member of a recognised trade union, you can also seek information and advice from your trade union representative.