**Ad Astra Whistleblowing Policy**

**Introduction**

Ad Astra are committed to conducting their business fairly, honestly and with transparency and in compliance with all legal and regulatory obligations. We expect Ad Astra directors, employees and anyone acting on our behalf to do the same and to maintain the highest standards of ethical business behaviour. However, all organisations face the risk of things going wrong from time to time. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur. A key aspect of ensuring and maintaining Ad Astra’s commitment to conducting business with such integrity and in an open and fair manner is providing a robust whistleblowing policy and reporting channel for Ad Astra so that all colleagues feel able to report any wrongdoing in confidence.

 At Ad Astra we encourage employees to report any concerns as soon as they arise; such concerns can be of any nature, including any matters in connection with Ad Astra personnel, as well as customers, suppliers and other third parties.

The aim of this policy therefore is to:

• Encourage and empower colleagues to speak up and report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.

• Provide colleagues with guidance as to how to raise those concerns.

 • Reassure colleagues that they will be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

• Encourage a culture of openness.

• Ensure compliance for Ad Astra with the relevant legislation.

 This is not a policy to be used in order to question Ad Astra’s financial decisions or business strategy, nor should it be used to raise matters which would normally be considered under an HR grievance procedure (for example harassment, bullying or discrimination) or are already the subject of a disciplinary procedure.

 The below sets out in more detail what type of behaviour this policy covers and what should be reported pursuant to this policy

 This policy applies on a global basis to all Ad Astra entities and personnel (including directors, executives, officers, employees, contractors, agency workers, casual workers, consultants and trainees) no matter which team they work in or which office. It relates to actions by such personnel as well as any concerns a colleague may have with one Ad Astra customers, suppliers or any other third parties with which Ad Astra interacts or does business.

What Type of Misconduct Should Be Reported?

 As noted above, Ad Astra wants to hear about such conduct that is unlawful, dishonest or unethical as soon as possible and is committed to addressing it. The below provides examples of the types of misconduct or behaviour that could give rise to a report; however, it is not an exhaustive list and Ad Astra encourages all colleagues to report any behaviour or incidents which they have concerns about.

• Criminal activity or offences, including fraud, theft, and embezzlement.

• Corruption, bribery or blackmail.

 • Financial malpractice, impropriety or mismanagement.

• Facilitating tax evasion.

• Failure to comply with any legal or professional obligation or regulatory requirements.

 • Conduct likely to damage Ad Astra reputation or financial wellbeing.

• Actions which endanger the health and safety of [[ Insert Company Name Here ]] personnel or the public.

• Actions which cause damage to the environment.

• The deliberate provision of false information to public officers.

• A miscarriage of justice.

• Unauthorised disclosure of confidential information.

• The deliberate concealment of information relating to any of the above matters.

• Any retaliation against someone for speaking up or “whistleblowing”.

Everyone has a responsibility to report any such misconduct or potential misconduct as soon as they become aware of it. If you are uncertain whether something is within scope of this policy, it is preferable that any concerns are reported rather than kept to oneself.

**How to Report A Concern**

All Colleagues All of the options below include escalation to members of staff who are fully trained in whistleblowing reporting and procedures. Irrespective of the option exercised therefore, the whistleblowing procedures Ad Astra has in place ensure that you will be taken through and will fully understand the overall process and next steps.

Option 1 – Head of Provision - Any reports should be made to your line manager – Kate Frankish in the first instance for further investigation. This may be done either verbally or in writing. Your concern may be escalated to appropriate parties, on the condition that your concern does not implicate such parties.

A decision will then be taken as to who is best placed to investigate and resolve the matter. Option 2 – Appropriate Parties – Directors and/or Managing Director

 If the option of reporting to your Head of Provision is not feasible, is inappropriate or you feel uncomfortable in doing so for any reason (including if you have concerns about their involvement), or the response received is unsatisfactory, you can report the concern directly to an appropriate party for further investigation, in the instance, it would be the Director Lyz Shaw or MD Sam Shaw. A decision will then be taken as to who is best placed to investigate and resolve the matter.

 Option 3 – If you do not wish to use options 1 or 2 above for any reason, you can report your concern using LADO.

A representative from the LADO team will be available Monday-Friday. Please leave a voicemail on 01904 551783 or email your query to lado@york.gov.uk and we will aim to respond to your request within 24 hours (working day).

If you have an urgent query or you believe a child is at risk please contact the Multi Agency Safeguarding Hub (MASH) on 01904 551900

Outside office hours, at weekends and on public holidays please contact the emergency duty team on 01609 780780

If you wish to make an allegation or you have a concern about a professional working with children, young or vulnerable people in the City of York, a referral should be sent to the Local Authority Designated Officer using the LADO Referral Form, giving as much detail as possible. Completed LADO Referral Forms should be emailed using secure mail to lado@york.gov.uk

Contacts:

Head of Provision : Kate Frankish 07873 225426 email: kate.frankish@adastrauk.co.uk

Director: Lyz Shaw 07935224868 email: lyz.shaw@adastrayork.co.uk

Managing Director: Sam Shaw 07834697640 email: sam@adastrauk.co.uk

LADO: <https://www.saferchildrenyork.org.uk/allegations-against-childcare-professionals-and-volunteers.htm>

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| Signed | Date | Date reviewed |  | Changes made |
| Elizabeth Shaw | 2-5-2021 | 2-2-2022 |  |  |
| Elizabeth Shaw | 4-5-2022 | 4-2-2022 |  | Head of provision changed from Ruth Patterson to Kate Frankish |
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