

"We want every child to love swimming, respect the water and swim beautifully. That's why our standards are the highest and our approach is unique."

Puddle Ducks Franchising Ltd

Whistle Blowing Policy

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Definitions:

The Business Owner	A Director of PDF Ltd or Franchisee of a business trading as Puddle Ducks.
Whistle-Blower	A person who reports certain types of wrongdoing
PDF Ltd	Puddle Ducks Franchising Ltd
PDHQ	Puddle Ducks Registered Head Office; The Grain Store, Hollins Farm, Twemlow Lane, Cranage
Team member	Any Employee, member of an LLP, or Franchisee working for A Puddle Ducks Franchise or PDF Ltd.
The Network	The Network of Businesses trading as Puddle Ducks under a Franchise Agreement
The Investigation Team	A team put together by PDF Ltd with appropriate knowledge and expertise to investigate suspected wrong doing.



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Statement of Purpose:

At Puddle Ducks we take the health, safety and welfare of all team members, customers and the general public very seriously. We put robust policies and procedures in place to protect everyone who comes into contact with our Businesses, and this policy is designed to encourage and protect team members who wish to bring serious concerns about how businesses are being run to the attention of PDF Ltd.

Scope of this Policy:

This policy will set out the criteria that would instigate whistle blowing and the procedures that Puddle Ducks Franchising have put in place for anyone working for or on behalf of the Network.

For the purposes of this document the term **'team member'** is used to include Franchisees, Employees and Members across the Network, and PDHQ.

The Law protects workers if it is in the 'Public Interest' to whistle blow.

Further information about what constitutes 'Public Interest' and who is protected by law in the UK can be found here, as well as who to report concerns to, and what to do if you are not taken seriously:

<https://www.gov.uk/whistleblowing>

This policy should be read in conjunction with the Puddle Ducks Grievance Procedure, and the Puddle Ducks Complaints Policy, found in The Manuals and is not a substitute for seeking redress initially by using those processes.

Organisation and Key responsibilities:

All Team Members are required to operate according to their Franchise Agreements, Members Agreements and Employment Contracts, as well as within the Law.

PDF Ltd will:

- Investigate suspected wrongdoing thoroughly and consistently
- Protect the confidentiality of those involved
- Take action where wrong doing breaches any Puddle Ducks agreements or contracts.
- Inform relevant authorities where wrong doing breaks the Law.



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Practices and Arrangements:

PDF Ltd have several communication tools in place to support Team Members.

- Facebook forums for questions and general advice on any aspect of running a Puddle Ducks Franchise.
- PDF Ltd departmental teams all have email addresses for confidential advice or questions.
- The Technical Team are available via Email and Facebook for concerns regarding teaching or training.
- The Franchise Support team are available for confidential advice or concerns.

Serious concerns about any aspect of the way a business is being run or managed, should be raised with The Business Owner in the first instance, wherever possible.

In some cases, it may not be possible to raise a concern with The Business Owner, for example;

- If a concern has been raised previously, but wasn't taken seriously
- If The Business Owner(s) themselves is suspected of serious wrongdoing
- If wrong doing is suspected in another Franchise or by another Franchisee.
- If wrong-doing is suspected by a member of PDHQ.

Under these circumstances a concern can be raised using **The Puddle Ducks Whistle Blowing Procedure. (below)**

Please do not discuss serious concerns with other Team Members as this could affect any subsequent investigations that need to take place.

Examples of wrong doing that should be raised:

The following things are some examples of the kinds of things that PDF Ltd consider should be raised. This list is not exhaustive, so if there is any doubt about whether something should be raised advice can be sought from a member of the PDHQ team or by using the Whistle Blowing Procedure (below).

- Falsified financial accounts or any falsification of internal finance systems
- Misuse of business funds
- Failure to provide a workplace pension or holiday entitlement
- Failure to pay Team Members or to follow HMRC rules

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- Taking payments without providing the agreed service, or failure to follow the Puddle Ducks terms and conditions of sale.
- Consistently or deliberately not following the Puddle Ducks Health and Safety protocols such as Risk Assessments, PSOPS, DBS etc
- Use of un-trained, un-qualified or uninsured teachers
- Threatening or abusive behaviour or bullying towards customers, suppliers or Team Members, or failure to follow the Puddle Ducks grievance procedure
- Repeated failure to deal with customer complaints
- Repeated failure to pay bills, or undue delay in paying bills.
- Breaking GDPR rules or non-disclosure of a breach.
- Consistently failing to follow Puddle Ducks Values

*Remember that if you suspect that any of the following things have taken place or are going to happen, you are **protected by law** if you whistle blow, as these things are deemed to be in the Public Interest:*

- *Any Criminal Offence, E.g. Fraud.*
- *If a someone's Health and Safety is in danger*
- *If the Law is being broken e.g. If the right insurance isn't in place*
- *If there is a risk of actual damage to the environment*
- *If someone is covering up wrong doing*
- *If there has been a miscarriage of justice*

The Whistle Blowing Procedure:

1. The Whistle Blowing form found here <https://www.puddleducks.com/whistle-blowing> should be used to provide details of the suspected wrongdoing. This can be done anonymously if preferred, however PDF Ltd would encourage any person to include their own details as it assists investigation significantly.
2. You may prefer to speak to or email a member of the PDF team, and this is fine. Please use the email whistle.blowing@puddleducks.com or call Franchise Support on 01477 410082.
3. The Whistle Blowing Form will be sent to PDHQ for review.
4. After reviewing the details contained in the form, if required, the Investigation Team will be appointed to investigate and gather evidence.
5. Further action will be taken by PDF Ltd if it is found that there has been a breach of franchise agreement, members agreement, employment contracts or policies.
6. Should there be evidence of illegal wrongdoing, PDF Ltd will take this up with the appropriate authorities.