

Whistleblowing Policy

1. Policy Statement

We are committed to conducting the business with honesty and integrity, and we expect all employees to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur. This policy covers all employees, officers, consultants, contractors, casual workers and agency workers

The aims of this policy are:

- To encourage employees to 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.
- To provide employees with guidance as to how to raise those concerns.
- To reassure employees that they should be able to raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken.

2. The Definition Of Whistleblowing

Whistleblowing is the disclosure of information by an employee which relates to some danger, fraud or other illegal or unethical conduct in the workplace. The Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998) governs the making of disclosures concerning workplace activities and is intended to protect employees who "blow the whistle" on wrongdoing from being subjected to any detriment or unfairly dismissed as a result.

Whistleblowing involves the disclosure of information (a "protected disclosure") which, in the reasonable belief of the person making it, is made in the public interest and tends to show one or more of the following:

- a criminal offence, this may include, for example, types of financial impropriety such as fraud
- miscarriages of justice
- risk to health and safety
- damage to the environment
- failure to comply with any legal obligation or regulatory requirements
- financial fraud or mismanagement
- negligence
- breach of our internal policies and procedures
- conduct likely to damage our reputation
- unauthorised disclosure of confidential information
- the deliberate concealment of any of the above matters
- sexual harassment

A **whistleblower** is a person who raises a genuine concern in good faith relating to any of the above. If they have any genuine concerns related to suspected wrongdoing or danger affecting any of the organisation's activities (**a whistleblowing concern**) they should report it under this policy (See 'Raising and Reporting a Whistle Blowing Concern' below).

This policy should not be used for complaints relating to their own personal circumstances, such as the way they have been treated at work. In those cases, they should use the **Grievance Procedure** or **Anti-Harassment and Bullying Policy** as appropriate.

If the individual is uncertain whether something is within the scope of this policy, they should seek advice from their line manager, the HR Department or one of the directors.

3. Raising and Reporting A Whistleblowing Concern

We hope that in many cases they will be able to raise any concerns with their line manager or one of the Directors. They may tell them in person or put the matter in writing if they prefer as promptly as possible. Their line manager or one of the Directors may be able to agree a way of resolving their concern quickly and effectively. In some cases, they may refer the matter to the HR Department.

However, where the matter is more serious, or they feel that their line manager or one of the Directors has not addressed their concern, or they prefer not to raise it with them for any reason, they should contact the HR department directly.

We will arrange a meeting with them as soon as possible to discuss their concern. They may bring a colleague or union representative / official to any meetings under this policy. The companion must respect the confidentiality of the disclosure and any subsequent investigation.

We will take down a written summary of the concern and provide them with a copy after the meeting. We will also aim to give them an indication of how we propose to deal with the matter.

Alternatively, they may report a concern confidentially to the HR department by clicking ('ctrl': 'return') on the following link:

[Whistleblowing Disclosure](#)

4. Confidentiality

All employees should feel able to voice whistleblowing concerns openly under this policy. However, if they want to raise their concern anonymously, we will make every effort to keep their identity secret. If it is necessary for anyone investigating their concern to know their identity, we will discuss this with them in the first instance.

We do not encourage employees to make disclosures anonymously as they may find it harder to argue that a dismissal was a direct result of whistleblowing. Proper investigation may be more difficult or impossible if we cannot obtain further information from them. It is also more difficult to establish whether any allegations are credible and have been made in good faith. Whistle-blowers who are concerned about possible reprisals if their identity is revealed should come forward to the HR Department and appropriate measures can then be taken to preserve confidentiality.

If the individual is in any doubt, they can seek advice from Protect, the independent whistleblowing charity, who offers a confidential helpline. Their contact details are at the end of this policy.

5. External Disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases, they should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for the individual to report their concerns to an external body such as a regulator. The independent whistleblowing charity, **'Protect'**, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern.

Whistleblowing concerns usually relate to the conduct of our employees, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. The law allows them to raise a concern in good faith with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, we encourage you to report such concerns internally first. You should contact your line manager or the HR Department or one of the Directors.

6. Investigation And Outcome

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of its assessment. You may be required to attend additional meetings in order to provide further information.

In some cases, we may appoint an investigator or team of investigators including employees with relevant experience of investigations 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.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

The investigation may involve interviews with all parties involved and confidentiality of those interviews. Any necessary action will take place, potentially reporting this to an external agency.

If we conclude that a whistle-blower has made false allegations maliciously, in bad faith or with a view to personal gain, the whistle-blower will be subject to disciplinary action.

7. Appeal

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.

If you are not satisfied with the outcome, you may appeal in writing to the HR Department or one of the Directors, stating your full grounds of appeal, within one week of the date on which the decision was sent or given to you.

8. Protection And Support For Whistle-Blowers

It is understandable that whistle-blowers are sometimes worried about possible repercussions. We aim to encourage openness and will support employees who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Employees shall not suffer any detrimental treatment as a result of raising a concern in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your line manager or one of the Directors immediately. If the matter is not remedied, you should raise it formally using the Company's **Grievance Procedure**.

Employees must not threaten or retaliate against whistle-blowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

9. Responsibility For The Success Of This Policy

All employees are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing.

10. Contacts

Protect (Independent Whistleblowing Charity)

Helpline: (020) 3117 2520 Website: www.protect-advice.org.uk