

# WHISTLE BLOWING POLICY

We seek to conduct our business honestly and with integrity at all times and accordingly we promote a culture of openness and accountability. However, we acknowledge that all businesses face the risk of things going wrong from time to time, or that concealed malpractice, illegal or unethical conduct may be taking place. Any suspected wrongdoing should be reported as soon as possible.

This policy applies to employees, officers, agency workers, casual workers, consultants and self-employed contractors.

This policy does not form part of your contract of employment and we may amend it at any time. We will review the policy from time to time to ensure that it continues to reflect our legal obligations and the Company's organisational and business needs.

## Responsibilities

Everyone has a role to play in ensuring the success of this policy. This policy should be followed to report any suspected danger or wrongdoing as soon as possible. All managers must set an appropriate standard and must proactively promote awareness of this policy and ensure that concerns are taken seriously.

## What is Whistleblowing?

Whistleblowing describes the act of reporting or disclosing information which relates to suspected wrongdoing or dangers at the workplace. This may include:

- (a) Criminal activity, including bribery or fraud;
- (b) Failure to comply with any legal obligation;
- (c) Failure to comply with any professional obligation or regulatory requirement;
- (d) Miscarriages of justice;
- (e) Danger to health and safety;
- (f) Damage to the environment;

- (g) Breach of our internal policies and procedures;
- (h) Conduct likely to cause damage to our reputation or financial wellbeing;
- (i) Unauthorised disclosure of financial information;
- (j) Serious negligence;
- (k) The deliberate concealment of any of the above matters.

If you have a genuine concern about any of the above you should report it under this policy as a whistleblowing concern, it will then be investigated. It is not necessary for you to have gathered evidence or proof, provided you have a genuine concern this should be reported.

This policy is not intended to be used for complaints or concerns relating to your own personal circumstances. Please raise such matters under the Grievance Policy.

## Reporting Whistleblowing Concerns

In the first instance, you are encouraged to report concerns to your manager. If you prefer not to raise it with your manager for any reason you should report your concern to the Finance Director.

Once you have reported a whistleblowing concern we will arrange a meeting as soon as possible to discuss it with you. You may bring a colleague or trade union representative to any meeting held under this policy. Your companion must maintain the confidentiality of the whistleblowing concern and any subsequent investigation.

You may provide a written statement detailing the whistleblowing concern. We will make notes during the meeting and produce a written summary of the whistleblowing concern to provide to you after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.



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## Confidentiality

We do not encourage anonymous reporting of whistleblowing concerns and would urge you to raise your whistleblowing concern openly under this policy, as anonymous reports are often difficult to investigate.

You may decide to request confidentiality when raising your whistleblowing concern. If this is the case we will make every effort to keep your identity secret and will discuss with you in advance where we feel that it is necessary to reveal your identity to those involved in investigating your concern.

## Investigation Process and Outcomes

After the initial meeting with you has taken place we will determine the scope of the investigation that is appropriate to investigate the whistleblowing concern. You may be required to attend additional meetings or provide further information.

We will appoint a suitable investigator, this may be someone with relevant experience or knowledge and understanding of the subject matter of the concern.

We will endeavour to keep you informed of the progress of the investigation, you must treat any information about the investigation as confidential. In some cases the need for confidentiality will prevent us from giving you specific details of the investigation, outcome or any action taken as a result of your whistleblowing concern.

## External Disclosures

We encourage you to use this policy whenever you have a whistleblowing concern, we have an internal mechanism for reporting, investigating and remedying any wrongdoing or dangers in the workplace. In most cases it should not be necessary to disclose your concerns externally.

We recognise that in some circumstances it may be appropriate for you to report concerns to an external body, such as a regulator. It will very rarely be appropriate to alert the media. You are strongly encouraged to seek advice before reporting a concern to anyone external. Public Concern at Work is an independent whistleblowing charity, which offers a confidential helpline and maintains a list of prescribed regulators for reporting certain types of concern. See [www.pcaw.co.uk](http://www.pcaw.co.uk)

## Protection and Support

We actively promote a culture of openness and will support those who raise genuine whistleblowing concerns under this policy, even if they turn out to be mistaken. This does not apply to those who make false allegations maliciously or with a view to personal gain, in this situation disciplinary action may be taken under the Disciplinary Policy against the person who made the false report.

Whistleblowers will not suffer any detrimental treatment as a result of raising a genuine whistleblowing concern. If you consider that you are being subjected to detrimental treatment you should inform the Finance Director. If the matter is not remedied you should raise it formally under the Grievance Policy.

We do not tolerate retaliation against those who raise genuine whistleblowing concerns. Any individual who threatens or retaliates against a whistleblower in any way will be subject to disciplinary action under the Disciplinary Policy.

## Key Contacts

Finance Director - Trevor Clingo - 01283 554672

Public Concern at Work  
Confidential Helpline: 020 7407 6609  
[www.pcaw.co.uk](http://www.pcaw.co.uk)



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