



OUR POLICY ON WHISTLEBLOWING

What's this policy about?

We are committed to conducting our business with honesty and integrity and expect the same of our employees. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. If a situation like this does occur, we want you to know that your concerns will be taken seriously, and investigated if need be, and that we encourage a culture of openness and accountability.

Our aim is to:

- encourage you to report suspected wrongdoing as soon as possible,
- provide you with guidance on raising your concerns, and
- reassure you that, if you raise genuine concerns that turn out to be mistaken, you won't face repercussions.

Is this policy part of my contract of employment?

No, and we can change this policy at any time, but if any changes are made, we'll always make you aware of them. We may also vary things like time limits, if we feel we need to.

Who's covered by this policy?

This policy applies to all employees, directors and other officers, workers and agency workers, volunteers and interns. We also require in any contracts with self-employed consultants or contractors that they comply with this policy, and we'll make sure they're given access to a copy. All these people are referred to as '**Staff**' in this policy.

Who's responsible for this policy?

While we ask all managers to take responsibility for making sure this policy is complied with, its successful operation also depends on you. Please take the time to read and understand it and to go back to your manager with any questions you may have.

If we say 'Directors' in this policy, we mean the most senior people within our organisation who are responsible for reviewing the effectiveness of actions taken when responding to concerns that you or other Staff may raise.

What is whistleblowing?

Whistleblowing is raising a genuine concern about a dangerous or illegal activity or any wrongdoing within our organisation. If you have any such concerns that you think could be a matter of public interest (**Whistleblowing Concerns**) you can report them under this policy. Whistleblowing Concerns may include:

- **Illegal activity.** Any type of criminal activity, miscarriage of justice or non-compliance with legal/professional obligations or regulatory requirements,
- **Danger & damage.** Dangers to health and safety, negligence or damage to the environment,
- **Financial crime.** Bribery, tax evasion, fraud or mismanagement,
- **Unauthorised disclosures.** Disclosing or using confidential information without permission, or
- **Covering up** any of the above.

If you're concerned about your personal circumstances, such as how you've been treated at work, and your concerns are unlikely to be in the public interest, then this is not the right policy to be looking at. Instead you can use our Grievance Procedure or Anti-harassment and Bullying Policy.

How do I raise a Whistleblowing Concern?

If you have a genuine concern relating to any of the areas mentioned above, we hope that you'll be able to raise them with your manager (in person or in writing). They may be able to resolve your concern quickly and effectively, however in some cases, they may refer your concern to a Director or external adviser.

If your concern is more serious, or you feel that your manager has not addressed your concern, or you prefer not to raise it with them for any reason, please contact a Director.

We'll arrange a meeting with you as soon as possible to discuss your concern. You can bring a colleague or union representative with you as long as they respect the confidentiality of your disclosure and any subsequent investigation. We'll give you a written summary of your concern and will aim to let you know how we'll handle the investigation.

How confidential is this process?

We hope that you'll feel able to voice any Whistleblowing Concerns openly. However, if you want to raise your concern confidentially, we'll do our best to keep your identity secret. If it's necessary for anyone investigating your concern to know your identity, we'll discuss this with you.

Please be aware that an investigation may be more difficult or impossible if you keep your identity anonymous, as we won't be able to obtain further information from you. It's also more difficult to establish whether your concerns are credible. If you're concerned about possible reprisals if your identity is revealed, please come forward to a Director so that appropriate measures can be taken to keep your identity secret.

If you have any concerns, you can seek advice from **Protect**, an independent whistleblowing charity with a confidential helpline. Their contact details can be found at the end of this policy.

Will I have to report my concerns outside of the organisation?

Our aim with this policy is to provide an effective internal process for reporting, investigating and remedying any genuine concerns you may raise. We therefore don't expect that you'll need to alert anyone outside of our organisation. However, the law may require you to report your concern to an external body (such as a regulator). **Protect** has a list of prescribed regulators you can contact to report certain types of concerns. Their contact details are at the end of this policy.

It will rarely, if ever, be appropriate to alert the media. Before reporting your concerns to anyone else outside of our organisation, we strongly recommend that you seek advice.

Although Whistleblowing Concerns usually relate to our Staff, they may sometimes relate to actions of a third party (such as a customer, supplier or service provider). While you can directly raise your concern with the third party by law, we encourage you to first report concerns about third parties internally to your manager.

How will the investigation be handled?

We'll carry out an initial assessment to determine the scope of any investigation and will notify you of the outcome. We may ask you to attend additional meetings to provide more information.

We'll aim to keep you updated on the investigation, including timeframes, which you should keep confidential. We may not be able to provide you with specific details if the information is particularly sensitive or confidential.

In some cases, we may appoint an investigator to make recommendations on minimising risk of future wrongdoing. These investigators may include Staff who have experience with whistleblowing investigations or specialist knowledge relating to your concern.

If we conclude that a whistleblower made false allegations maliciously, in bad faith or with a view to personal gain, the whistleblower may be subject to disciplinary action.

What if I don't agree with the investigation outcome?

While we do our best to handle your concern fairly, we can't guarantee the outcome you're looking for. If you're unhappy with how your concern has been handled, you can raise this with a Director. Alternatively, you can contact **Protect** for further advice. Their contact details can be found at the end of this policy.

How will I be protected as a whistleblower?

It's understandable that you may be worried about possible repercussions. We encourage openness and will support anyone who raises genuine concerns, even if they turn out to be mistaken. This includes protecting employees from dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you think this may have happened to you, please tell your manager straightaway. If the matter isn't then resolved, you can raise it formally using our Grievance Procedure

If any Staff threaten or retaliate against whistleblowers in any way, they may be subject to disciplinary action.

And that's it... for now

We understand that things change, so we'll continue to review the effectiveness of this policy and make sure it's achieving its objectives.

How do I contact Protect?

Protect is an independent whistleblowing charity. You can reach them at:

- their helpline number: 020 3117 2520,
- their contact form: <https://protect-advice.org.uk/contact-protect-advice-line/>,
- their website: www.protect-advice.org.uk.