



WHISTLEBLOWING POLICY

Scope and Purpose

The aim of the policy is to ensure that staff members are confident that they can raise matters of genuine concern without fear of reprisals, in the knowledge that their concerns will be taken seriously and investigated appropriately.

Policy

The Company is committed to the highest standards of quality, honesty, openness and accountability. The Company believes it has a duty to take appropriate measures to identify any wrongdoing within the business and attempt to remedy them.

If staff members have any concerns about malpractice in the workplace, they are expected to raise such concerns internally in accordance with the procedure set out in this policy. It is the staff member's responsibility to raise any concerns that he/she may have about malpractice in the workplace.

If a staff member raises a genuine concern under this policy, the Company wishes to assure them that it will take all reasonable steps to protect them from any form of retribution, victimisation, harassment or detriment. Staff members have statutory protection if they raise concerns in the right way and the Company will take their concerns seriously and it does not matter if they are mistaken.

The protection afforded by this policy does not extend to a member of staff if they maliciously raise a concern that they know is untrue. If an employee abuses this policy by making malicious allegations, that they know are untrue, he/she will be subject to disciplinary proceedings. If a casual worker abuses this policy they the Company may not offer them any further work or assignments and may terminate their contract with immediate effect.

Matters covered by Whistleblowing Policy

This policy is distinct from the Company's Grievance Procedure and Anti-Harassment and Bullying Procedure contained in this Handbook. If an employee has a complaint relating to their personal circumstances in the workplace then they should use the Grievance Procedure or Anti-Harassment and Bullying Procedure (as appropriate).

If a casual worker feels they have been subjected to bullying or harassment they should raise a complaint under the Anti-Harassment and Bullying Procedure.

This whistleblowing policy is for use if a staff member has concerns about wrongdoing within the Company.

It is impossible to give an exhaustive list of the activities that would constitute malpractice, but broadly speaking the Company would expect staff to report the following: -

- where a criminal offence has been committed, is being committed or is likely to be committed;
- where a person has failed, is failing or is likely to fail to comply with their legal obligations;
- where a miscarriage of justice has occurred, is occurring or is likely to occur;



- where the health and safety of any individual has been, is being, or is likely to be endangered; –
- where the environment has been, is being or is likely to be damaged; or
- any action intended to conceal information regarding any of the above matters.

In the context of the Company's business, particular areas where concerns may arise include gross misconduct under the Company's dismissal and disciplinary procedure, breach of the Company's code on breach of confidentiality, harassment occurring to others and breach of health and safety rules. If a staff member is in doubt as to whether any matters which are of concern to them come within the scope of this policy, the Company encourages staff to raise them.

The Company recognises that staff may prefer to make an anonymous report, however, they are encouraged not to do so. Although all reports, anonymous or otherwise, will be investigated, proper investigation may prove impossible if further information cannot be obtained from staff.

Reporting a concern

Staff should report concerns about any form of malpractice in the first instance to the Company Secretary. If, for whatever reason, the staff member feels they cannot speak with the Company Secretary about their concern or if they think their concern has not been handled properly, they should raise their concern with the Chief Executive Officer or a director of the Company.

Once the staff member has told the Company of their concern, the Company will look into it carefully and thoroughly to assess what action if any should be taken. Depending on the subject matter of the disclosure, this may mean an internal enquiry or a longer investigation. The staff member will be told who will be conducting the investigation and how long it is likely to last. The staff member will be kept informed of development and of the outcome of the investigation to the extent that this is appropriate and practicable in the circumstances. However, the need for confidentiality may prevent the Company being able to give staff specific details of the investigation or actions taken. The Company will aim to carry out the investigation in a timely manner. Depending on the findings of the investigation, internal and/or external procedures may be invoked in order for appropriate action to be taken.

Confidentiality

The Company will make every effort to keep staff identity details confidential if this is desired. However, there may be circumstances in which, because of the nature of the investigation or disclosure, it will be necessary to disclose staff members' identity. If this is the case, the Company will make efforts to inform the staff member that this is likely to be the case. The Company will take all reasonable steps to protect the staff member from any victimisation or detriment as a result of having made a disclosure.

In order not to jeopardise the investigation into the alleged malpractice, the staff member will be expected to keep the matter confidential.

External Reporting



The purpose of this policy is to give staff the reassurance they need to raise concerns internally. It is therefore hoped that external reporting will not be necessary. However, in various serious circumstances or following an internal report, which has not been addressed, it may be appropriate for staff to report their concerns to an external body. The Company would rather staff raise concerns with the appropriate regulator than not at all. The government has prescribed a list of appropriate bodies to such external reports, e.g. the Health and Safety Executive, the Environment Agency and Financial Services Authority. A full list is available from an independent charity called Public Concern at Work. The contact details are: tel: 020 7404 6609 and email: whistle@pcaw.org.uk.