

## Whistleblowing Policy and Procedure

### 1.1.1 General statement

We are committed to conducting our business in a responsible way and to ensuring that the public interest is safeguarded. The purpose of this Policy is to encourage our employees to raise legitimate concerns in a responsible way where they believe that there has been some form of malpractice.

### 1.1.2 What is Whistleblowing?

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

### 1.1.3 General principles

- 1) You must only raise concerns under this policy if there is a public interest involved. Concerns which relate to a personal grievance or private dispute should be dealt with under the grievance procedure.
- 2) Staff must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action. In some cases the whistleblower could have a right to sue you personally for compensation in an employment tribunal.
- 3) Abuse of this procedure by maliciously or mischievously raising unfounded allegations, either internally or externally, will be regarded as a serious disciplinary offence and may result in dismissal.
- 4) Where an allegation is made, the person or persons against whom the allegation is made shall be informed of the allegation and the evidence supporting it, and shall be allowed to comment before the investigation is completed.
- 5) Any allegation of malpractice shall be treated in the strictest confidence and investigated immediately. The identity of the individual raising the complaint shall not be disclosed to the alleged perpetrator of malpractice without that individual's prior approval, unless this is incompatible with a fair investigation. You will be informed of the need to disclose your identity in any event.
- 6) If you make an allegation you must have a reasonable belief that the allegation is true and it must not be made for personal gain

#### 1.1.4 Procedure

- 1) The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external. Public Concern at Work operates a confidential helpline on 020 74046609, or by email [whistle@pcaw.co.uk](mailto:whistle@pcaw.co.uk)

This procedure applies to the following allegations:

- that a criminal offence has been, is being, or is likely to be committed;
  - that a person has failed, is failing, or is likely to fail to comply with any legal obligation to which they are subject;
  - that a miscarriage of justice has occurred, is occurring, or is likely to occur;
  - that the health and safety of any individual has been, is being, or is likely to be endangered;
  - that the environment has been, is being, or is likely to be damaged;
  - that information tending to show any matter falling within one of the above categories has been, is being, or is likely to be deliberately concealed.
- 2) In the first instance, you should make any allegation covered by this procedure in writing to your Manager stating clearly that you are making an allegation under the protection of the Whistleblowing procedure.
  - 3) A record will be made of receipt of the disclosure and we will either investigate the disclosure or arrange for an appropriate member of the senior management team to do so.
  - 4) Once the investigation is completed, we will inform you, subject to any third party rights, of the outcome of the investigation.
  - 5) If you have any concerns or complaints about the manner in which you feel you are being treated because you made the disclosure, whether by the alleged wrongdoer or by any colleagues, you should raise this with a member of the senior management team and it may be dealt with as a disciplinary matter in relation to such individuals.
  - 6) If you are dissatisfied with the outcome of the investigation or feel unable to report it to your Manager in the first instance, disclosure should be made in writing to the appropriate Managing Director, who will investigate the matter and report back to the individual. The decision of the Managing Director will be final.