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1. Introduction

1.1 This policy applies to all employees. Other individuals performing functions in relation to the company, such as agency employees, contractors, consultants are also encouraged to use it.

1.2 It is important to the business that any fraud, misconduct or wrongdoing by employees of the company is reported and properly dealt with. The company therefore encourages all individuals to raise any concerns that they may have about the conduct of others in the business or the way in which the business is run.

1.3 The company has a procedure in place to deal with matters internally and as such individuals must follow the company internal processes initially via their line manager, so that important matters can be brought to the attention of the senior directors of the Company.

1.4 This policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with, and the support & protection that is available to employees when they do so

2. Overview

2.1 The law provides protection for employees who raise legitimate concerns about specified matters. These are called "qualifying disclosures". A qualifying disclosure is one made in the public interest by an individual who has a reasonable belief that:

- a criminal offence,
- human trafficking,
- a miscarriage of justice,
- an act creating risk to health and safety,
- an act causing damage to the environment,
- a breach of any other legal obligation,
- an act of sexual harassment, or
- concealment of any of the above

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Role	Responsibility
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HR	Maintains and periodically reviews this Policy.
All Employees	All are to comply with this Policy.

is being, has been, or is likely to be, committed. It is not necessary for the individual to have proof that such an act is being, has been, or is likely to be, committed; a reasonable belief is sufficient. The individual has no responsibility for investigating the matter; it is the company's responsibility to ensure that an investigation takes place.

2.3 An employee who makes such a protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimised, because they have made a disclosure.

2.4 The company encourages employees to raise their concerns under this procedure in the first instance. If an employee is not sure whether or not to raise a concern, they should discuss the issue with their line manager or Human Resources.

3. Principles

3.1 The main principles of this policy are:

3.1a Individuals should be watchful for illegal or unethical conduct and report anything of that nature of which they become aware.; The company encourages employees to report concerns internally as soon as possible where they suspect wrongdoing at work.

3.1b Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the individual who raised the issue.

3.1c No employee will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the employee will not be prejudiced because they have raised a legitimate concern.

3.1d Victimisation of an employee for raising a qualified disclosure will be treated in line with the company disciplinary policy & procedure.

3.1e If misconduct is discovered as a result of any investigation under this procedure the company's disciplinary procedure will be used, in addition to any appropriate external measures.

3.1f Maliciously making a false allegation is a disciplinary offence.

3.1g An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager or director, employees should not agree to remain silent. They should report the matter to someone more senior than the person giving the instruction or to the Group Human Resources Director.

3.2 This procedure is for disclosures about matters other than a breach of an employee's own contract of employment. If an employee is concerned that their own contract has been, or is likely to be, broken, they should use the company's grievance procedure.

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3.3 If an employee is unsure about whether their concerns are best dealt with under the Whistleblowing Policy or Grievance Procedure, they should speak to Human Resources for further advice.

4. Procedure

4.1 Stage 1 – Raising a whistleblowing concern

4.1a In the first instance, any concerns should be raised with the employee’s line manager unless the employee reasonably believes their line manager to be involved in the wrongdoing, or if for any other reason the employee does not wish to approach their line manager.

4.1b If the employee is concerned that their line manager is involved in the wrongdoing, they should inform the Group Human Resources Director. Any approach to the Group Human Resources Director will be treated with the strictest confidence and the employee’s identity will not be disclosed without their prior consent.

4.1c Employees are not encouraged to make disclosures anonymously. Proper investigation may be more difficult or impossible if further information cannot be obtained from the employee raising a concern. It is also more difficult to establish whether any allegations are credible.

4.2 Stage 2 – Investigating a whistleblowing concern

4.2a The line manager will arrange an investigation into the matter (either by investigating the matter themselves or immediately passing the issue to someone in a more senior position). The investigation may involve the employee and other individuals involved giving a written statement. Any investigation will be carried out in accordance with the principles set out above. The employee's statement will be taken into account, and they will be asked to comment on any additional evidence obtained. The line manager (or the person who carried out the investigation) will then report to the senior company directors. They will take any necessary action, including reporting the matter to any appropriate external body.

4.2b If disciplinary action is required, the matter will be dealt with by Human Resources in line with the company procedure. On conclusion of any investigation, the employee will be given an overview of the outcome of the investigation and the action the company will be taking (if any action is to be taken). Whilst the company aims to provide comprehensive feedback, in some cases this may not be possible, for example where data protection rules apply, or where there are sensitive issues that need to remain confidential.

4.3 Stage 3 – Appeal

4.3a If on conclusion of the above stages the employee reasonably believes that the appropriate action has not been taken, they can put in an appeal to the Group Human Resources Director. This appeal should be in writing, clearly setting out the grounds of the appeal (the basis that the original concern has not been satisfactorily dealt with). The Group Human Resources Director will consider the grounds for appeal and review the manner in which the original whistleblowing concern was handled. The employee will be informed in writing of the outcome as quickly as possible.

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4.4 Stage 4 – Raising Whistleblowing concerns externally

4.4a The company encourages employees to raise their whistleblowing concerns internally in the first instance. However, if they feel that appropriate action has not been taken, they can report the matter to the correct, proper authority. The Government website sets out a number of bodies to which qualifying disclosures may be made. These include (but are not restricted to):

- HM Revenue & Customs
- HM Treasury
- the Financial Conduct Authority (formerly the Financial Services Authority)
- the Competition and Markets Authority
- the Health and Safety Executive
- the Environment Agency
- the Independent Police Complaints Commission and
- the Serious Fraud Office.

5. Data Protection

5.1 When an individual makes a disclosure, the company will process any personal data collected in accordance with its data protection policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

Please note that these are policy guidelines setting out the standards that we expect you to adhere to under this policy. They are not incorporated into your contractual terms and the Company reserves the right to amend them from time to time or withdraw entirely.

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