

WHISTLEBLOWING POLICY

Introduction

We have both a grievance procedure and a bullying, sexual harassment and harassment procedure in place to enable you to lodge a grievance relating to your own employment.

The whistle-blowing policy is intended to cover other serious concerns that fall under the Public Interest Disclosure Act 1998. We are committed to running our business with honesty and integrity and within the restraints of the law. As such, whilst legislation protects you from suffering a detriment at work if you take a matter to a relevant outside body, we would hope that you would feel able to bring any concerns you may have to the attention of your Manager with confidence that any such concern would be dealt with appropriately and swiftly and without any fear of reprisal, even if your belief of wrongdoing turns out to be unfounded as the result of a thorough investigation.

Whistle Blowing is the everyday term used to describe a disclosure made to someone in authority alleging corruption, malpractice, or wrongdoing by another person. In employment, whistle-blowing refers to an employee ("whistleblower") making a disclosure about a colleague's conduct in the course of employment or about the employer's practices.

The Legal Position

Employees and workers who make a 'protected disclosure' are protected from being detrimentally treated or being dismissed as a result of making the disclosure. The Act offers protection to any person who makes a disclosure relating to the following serious offences: -

- Criminal offences
- Risks to health and safety
- Failure to comply with a legal obligation
- A miscarriage of justice
- Environmental damage
- Sexual harassment

For a disclosure to be protected, it must be made to an appropriate body. For example, disclosing a health and safety issue to the Health and Safety Executive is likely to be protected, but not if the concern is disclosed to the media. The raising of concern will be covered by this policy, provided you have a reasonable belief that the disclosure is made in the public interest.

Procedure

We are committed to the highest possible standards of operation. In line with that commitment, we encourage you to consider raising the matter with your Manager before taking the matter to an outside body. We will take all such concerns seriously, and any individual raising legitimate concerns under this policy will not be subjected to any detriment either during or after employment. All such concerns raised will be thoroughly investigated, and appropriate action will be taken accordingly.

Safeguarding Complaints

We recognise that the decision to report a concern can be a difficult one to make and we will support you during the process. We will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect you when you raise a concern to us in good faith.

Every effort will be made to keep the identity of the whistle-blower who makes a disclosure under this policy confidential, at least until a formal investigation is underway.

In order to ensure that a fair investigation can take place, the whistleblower will also be expected to keep the fact that they have raised a concern, the nature of the concern and the identity of those involved confidential. It may be that during an investigation, disciplinary or legal proceedings, the Company no longer maintains the whistleblower's confidentiality. If that does occur, then the Company will endeavour to notify the whistleblower in advance.

Untrue Allegations

If you make an allegation, but it is not confirmed by the investigation, no action will be taken against you. If you make an allegation maliciously, vexatiously, or for personal gain, disciplinary action may be taken against you and, dependent upon the circumstances, this may be treated as gross misconduct.