

WHISTLEBLOWING POLICY

1. WHISTLEBLOWING

- a. In this policy 'Whistleblowing' means the reporting by employees of suspected misconduct, illegal acts or failure to act within the Company.
- b. The aim of this Policy is to encourage employees and others who have serious concerns about any aspect of the Company's work to come forward and voice those concerns.
- c. Employees are often the first to realise that there may be something seriously wrong within the Company. 'Whistleblowing' is viewed by the Company as a positive act that can make a valuable contribution to the Company's efficiency and long-term success. It is not disloyal to colleagues or the Company to speak up.
- d. The Company is committed to achieving the highest possible standards of service and the highest possible ethical standards.
- e. If an employee or other is considering raising a concern, they should read this Policy first. It explains:
 - i. the type of issues that can be raised
 - ii. how the person raising a concern will be protected from victimisation and harassment
 - iii. how to raise a concern, and
 - iv. what the Company will do.

2. POLICY AIMS

- a. The Policy is designed to ensure that employees can raise their concerns about wrongdoing or malpractice within the Company without fear of victimisation, subsequent discrimination, disadvantage or dismissal.
- b. It is also intended to encourage and enable employees to raise serious concerns within the Company rather than ignoring a problem or 'blowing the whistle' outside.
- c. This Policy aims to:
 - i. encourage employees to feel confident in raising serious concerns at the earliest opportunity and to question and act upon concerns about practice
 - ii. provide avenues for employees to raise those concerns and receive feedback on any action taken
 - iii. ensure that employees receive a response to concerns raised and that they are aware of how to pursue them if they are not satisfied
 - iv. reassure employees that they will be protected from possible reprisals or victimisation if a disclosure has been made in good faith.

1. POLICY SCOPE

- a. This Policy is intended to enable those who become aware of wrongdoing in the Company affecting some other person or service, to report their concerns at the earliest opportunity so that they can be properly investigated.
- b. The Whistle Blowing Policy is not intended to replace existing procedures:
 - I. If a concern relates to own treatment as an employee, it should be raised under the existing grievance or harassment procedures
 - II. If a client has a concern about services provided to him/her, it should be raised as a complaint to the Company
 - III. Complaints of misconduct by Company employees, contractors or agents are dealt with under a separate procedure as set out in the Company Employee Handbook.
- c. This policy applies to all employees, contractors, agents and any other person conducting any business on behalf of the Company whether on Company premises, client premises, the employee's premises or overseas in any location.

2. WHAT SHOULD BE REPORTED?

- a. Any serious concerns that employees have about service provision or the conduct of officers or employees of the Company or others acting on behalf of the Company that:
 - I. make employees feel uncomfortable in terms of known standards.
 - II. are not in keeping or enabling compliance with legal requirements and Company policies.
 - III. fall below established standards of practice; or
 - IV. are improper behaviour.
- b. These might relate to:
 - I. conduct which is an offence or a breach of the law (a criminal offence has been committed or failing to comply with any other legal obligation)
 - II. racial, sexual, disability or other discrimination
 - III. health and safety
 - IV. unauthorised use of Company funds or other assets
 - V. possible fraud and corruption
 - VI. neglect or abuse of clients, or
 - VII. other unethical conduct.

This list is not exhaustive.

3. PROTECTING THE WHISTLEBLOWER

- a. This policy has been written to take account of the Public Interest Disclosure Act 1998 which protects workers making disclosures about certain matters of concern, when those disclosures are made in accordance with the Act's provisions and in the public interest.

- b. The Act makes it unlawful for the Company to dismiss anyone or allow them to be victimised on the basis that they have made an appropriate lawful disclosure in accordance with the Act.
- c. Rarely, a case might arise where it is the employee that has participated in the action causing concern. In such a case it is in the employee's interest to come into the open as soon as possible. The Company cannot promise not to act against such an employee, but the fact that they came forward may be considered.
- d. The Company is committed to good practice and high standards and to being supportive of employees.
- e. The Company recognises that the decision to report a concern can be a difficult one to make. If an employee honestly and reasonably believes that what is being reported is true, they should have nothing to fear because they are doing their duty to the Company, colleagues, and clients.
- f. The Company will not tolerate any harassment or victimisation of a whistleblower (including informal pressures) and will take appropriate action to protect whistleblower when they raise a concern in good faith and will treat this as a serious disciplinary offence which will be dealt with under the disciplinary rules and procedure.

4. CONFIDENTIALITY

- a. All concerns will be treated in confidence and every effort will be made not to reveal the whistleblower's identity.
- b. If disciplinary or other proceedings follow the investigation, it may not be possible to act because of disclosure without the help of the whistleblower, so they may be asked to come forward as a witness. If they agree to this, they will be offered advice and support.
- c. This Policy encourages whistleblowers to put their name to their allegation(s) whenever possible. If they do not tell us who they are it will be much more difficult for us to protect their position or to give them feedback. This policy is not ideally suited to concerns raised anonymously.
- d. Concerns expressed anonymously are much less powerful, but they may be considered at the discretion of the Company. In exercising this discretion, the factors to be taken into account would include:
 - I. the seriousness of the issue raised
 - II. the credibility of the concern, and
 - III. the likelihood of confirming the allegation from other sources

5. UNTRUE ALLEGATIONS

- a. If a whistleblower makes an allegation in good faith and reasonably believing it to be true, but it is not confirmed by the investigation, the Company will recognise their concern and the whistleblower have nothing to fear.
- b. If however, a whistleblower make an allegation frivolously, maliciously or for personal gain, appropriate action that could include disciplinary action, may be taken.

6. RAISING A CONCERN

- a. Concerns should normally raise concerns with the Company CEO
- b. If a whistleblower is unsure who to contact, the independent charity Protect can provide advice. They offer a free and confidential helpline on 020 3117 2520

7. TRAINING

- a. The Company will provide training to all employees to help them understand their duties and responsibilities under this Policy. The Company's zero tolerance approach to any harassment or victimisation of a whistleblower will also be communicated to all employees.

8. FAILURE TO COMPLY

- a. Employees are reminded that a failure to comply with the terms set out in this policy could result in disciplinary proceedings as outlined in the Company Handbook and the Disciplinary Policy.

9. POLICY REVIEW

- b. This policy does not form part of an individual's contract of employment and may be amended from time to time.