Whistleblowing Policy

1. Overview

Whistleblowing is when an individual knows, or suspects, that there is some wrongdoing occurring within the organization and alerts the employer or the relevant authority accordingly.

The Public Interest Disclosure Act 1998 gives protection to all employees, including casual workers, agency workers, and contractors who make a qualifying disclosure when they reasonably believe it is in the public interest for them to do so.

2. Actions Taken (Employee)

If an employee knows or suspects that some wrongdoing is occurring within the Company, they should raise the matter immediately with their line manager, or if that is not appropriate, a Company director.

3. Possible Situations

Although this list is not exhaustive, examples of situations which it might be appropriate for an employee to report wrongdoing include:

- A breach, or potential breach, of health and safety legislation.
- Financial irregularities.
- Harassment of a colleague, client or other individual.
- Damage to the environment.
- Breach of employment law.
- The committing of a criminal offence.
- An act of bribery.
- Deliberate concealment of any of the above.

4. Action Taken (Management)

Any manage who is informed of potential wrongdoing will take immediate action to investigate the situation. In doing so, they will take every reasonable step to maintain the anonymity of the employee who has made the allegation of wrongdoing.

The employee who has raised the issue will be kept informed of any investigation that is taking place. They will also be informed of the outcome of the investigation. It might not always be appropriate to disclose the details of action taken, however they will be informed *if* action is taken.

5. Alerting Outside Bodies’

An employee should always, in the first instance, talk to a manager in the Company about potential wrongdoing. If they are not satisfied with the response, the employee is entitled to contact a relevant external body to express concerns. In doing so the employee should:

- Have a reasonable believe that the allegation is based on correct facts.
- Make the disclosure to the relevant body.
- Have reasonable believe that it is in the public interest to make the disclosure.

A ‘relevant body’ is likely to be a regulatory body (e.g. Health and Safety Executive, or the Financial Services Authority).

6. Protection Against Detriment

An employee may be worried that reporting such issues could lead to victimisation, detriment, or risking job security. The is understandable, however if the information provided is given in good faith there will be no adverse impact on the employee, and they will be protected from suffering any detriment in relation to the allegations that are made.

If an employee does not follow the procedure set out in this document, which encompasses the requirements of the Public Disclosure Act 1998, the protection against detriment will not apply. Disclosing information in an inappropriate way (e.g. contacting the media) could result in disciplinary action being taken, which could include dismissal.