

Whistleblowing Policy

The businesses within the Group are committed to conducting their business with honesty and integrity and expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.

This policy covers all employees, officers, consultants, contractors, volunteers, interns, casual workers and agency workers. We also encourage suppliers, contractors and other third parties connected within our business to raise concern under this policy.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

WHAT IS WHISTLEBLOWING?

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, facilitation of tax evasion, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations, as well as any concerns relating to modern slavery, human trafficking, forced labour or exploitation

To qualify for protection under the law, a disclosure must be made in the public interest. This means it should affect others, such as the general public, customers, colleagues, or the organisation itself, rather than being a personal grievance about an individual's employment terms.

RAISING A CONCERN

We hope that in many cases, the employee will be able to raise any concerns with their manager. However, where they prefer not to raise it with their manager for any reason, they should contact People & Culture Team Manager, or the Managing Director/Leader of the relevant business or the Group Leadership team.

P&C will arrange a meeting with the employee as soon as possible to discuss the concern. The employee may bring a colleague or union representative to any meetings under this policy. The companion must respect the confidentiality of the disclosure and any subsequent investigation.

Disclosures can be made anonymously – however, this may limit our ability to investigate the concern fully or provide feedback.

CONFIDENTIALITY

We hope that staff will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If an employee wants to raise their concern confidentially, we will make every effort to keep their identity secret and only reveal it where necessary to those involved in investigating your concern.



EXTERNAL DISCLOSURES

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases, the employee should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for the employee to report your concerns to an external body such as a regulator. We strongly encourage the employee to seek advice before reporting a concern to anyone external. Protect operates a confidential helpline. Their contact details are at the end of this policy.

PROTECTION AND SUPPORT

We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. It is unlawful under the Public Interest Disclosure Act 1998 for an employee to be dismissed or subjected to any detriment because they have a protected disclosure. If an employee believes that they have suffered any such treatment, they should inform – Rachael Walsh-Grant (People & Culture Team manager) immediately.

Employees must not threaten or retaliate against whistleblowers in any way. If they are involved in such conduct, they may be subject to disciplinary action.

However, if we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

CONTACT INFORMATION

Protect (Independent whistleblowing charity)	Helpline: 0203 117 2520 Website: https://protect-advice.org.uk/
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Related Policies

This policy should be read alongside the Anti-Slavery and Human Trafficking Policy, which sets out the Groups commitment to preventing slavery and human trafficking in all its business activities and supply chains.

