Whistle Blowing Policy

Policy statement
All employees at one time or another have concerns about what is happening at work. Usually these concerns are easily resolved. However, when they are about unlawful conduct, financial malpractice, or dangers to employees, the public or the environment it can be difficult to know what to do.

The Group has introduced this procedure to enable you to raise your concerns about such malpractice at an early stage and in the right way. This Whistle Blowing Procedure is primarily for concerns where the interests of others or of the organisation itself are at risk.

Scope
This policy applies to all Group employees. Responsibilities for various aspects are allocated as follows:

Managing Director
The Managing Director will be responsible for the policy and procedure ensuring that all concerns raised are dealt with fairly, thoroughly and in accordance with the policy.

Line Managers
All managers are responsible for ensuring that staff are aware of the policy and its application, and for creating an environment in which staff are able to express concerns freely and without fear of reprisal.

Individuals
The individual has a responsibility to raise concerns providing she/he has a reasonable belief that malpractice/wrongdoing has occurred.

Legal responsibilities
The Board of Directors have a general duty to ensure the health and welfare of employees and ensure the company operates within the governing laws.

Procedures

Safety and confidence
The Board is committed to this policy. If you raise a genuine concern under this policy, you will not be at risk of losing your job or suffering any form of retribution as a result. Provided you are acting in good faith, it does not matter if you are mistaken.
We will not tolerate the harassment or victimisation of anyone raising a genuine concern. Should you wish to raise a concern in confidence, we will not disclose it without your consent.

This policy is provided for the protection of those who wish to formally raise their concerns.

**Our Actions**
Once you have told us of your concern, we will look into it to assess initially what action should be taken. This may involve an internal inquiry or a more formal investigation.

**Your Actions**

**Step one**
If you have a concern about malpractice, we hope you will feel able to raise it first with your line manager. This may be done in person or in writing.

**Step two**
If you feel unable to raise the matter with your line manager, for any reason, please raise the matter with the Managing Director.

Please say if you want to raise the matter in confidence so that she or he can make appropriate arrangements.

**External Contacts**
Whilst we hope this policy gives you the reassurance you need to raise such matters internally, we recognise that there may be circumstances where it may be proper to report matters to outside bodies, such as regulators or the Police.

The independent charity Public Concern at Work (020 7404 6609), or a trade union will be able to advise you on such an option and on the circumstances in which you should contact an outside organisation and an appropriate way to make that contact.

Greg Houlston
CSR and Sustainability Director
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