

Whistleblowing Policy

We are committed to running our business with integrity and complying with all our legal obligations. We expect everyone who works for us to maintain the highest of standards. However, we acknowledge that it is possible that, from time to time, things may go wrong. The aim of this policy is to encourage you to raise any genuine concerns you might have about certain wrongdoings at work without fear of reprisal, to provide you with guidance on how to raise those concerns and to enable us to investigate such concerns and deal with them appropriately.

This policy *[has been agreed with senior management and] [has been drawn up following consultation/in agreement with our relevant employee representatives/recognised trade unions and]* has the full support of our board of directors.

Who this policy applies to

This policy applies to all employees[, officers, workers, [self-employed contractors], apprentices, agency workers, [volunteers] and interns] (together referred to as ‘**staff**’)

Scope

This policy is for making a disclosure of wrongdoing where you [reasonably] believe that the disclosure is in the public interest. You should not generally use this policy for complaints relating only to your own circumstances, such as the way you have been treated at work. In those cases, you should generally use the **[Policy - grievance]** or the **[Policy - anti-bullying and harassment]**, as appropriate. If you are uncertain whether or not something is within the scope of this **[Policy – whistleblowing]**, you should seek advice from *[position]*.

Types of wrongdoing addressed by this policy and how to raise concerns

This policy covers the following types of suspected ‘**wrongdoing**’:

- a criminal offence, including bribery;
- a failure to comply with any legal obligations;
- a miscarriage of justice;
- danger to the health and safety of any individual;

- damage to the environment;
- the deliberate concealment of information concerning any of the matters listed above

If you genuinely [and reasonably] believe that we, or any of our staff, or a third party such as one of our [customers, clients, suppliers[or/,] service providers [or *add details of relevant third parties*]] have taken, are intending to take or have failed to take action that you could lead or amount to such wrongdoing, you should – if you [reasonably] believe that the disclosure of the wrongdoing is in the public interest - disclose this information verbally or in writing to [designated person] or [alternative designated person][or,][*an independent person or organisation with contact details, such as the company whistleblowing hotline or a member of the management of a parent or group company.*]

If you make such a disclosure, you should provide full details and, where possible, supporting evidence.

Any concerns about wrongdoing covered by this policy should be raised internally with the company, as set out above, to allow us the chance to investigate and deal with them. However, there are some limited exceptions to this:

- In some circumstances, it may be appropriate to raise your concern with a 'prescribed body', such as with the appropriate regulator. ('Protect' – see below - also have a list of people and organisations that are classed as prescribed bodies for reporting certain types of concerns.)
- If your concern relates to the wrongdoing of a third party, such as one of our [customers, clients, suppliers[or/,] service providers [or *add details of relevant third parties*]], you may in some circumstances raise the matter directly with the third party. However, we encourage you to report such concerns to us internally first to [designated person] or [alternative designated person][or,][*an independent person or organisation with contact details, such as the company whistleblowing hotline or a member of the management of a parent or group company.*]

Other than in such cases, you should only air concerns externally about wrongdoing covered by this policy in exceptional circumstances, for example if you have good reason to believe that evidence would be destroyed if you did not do so.

We strongly encourage you to seek advice before reporting a concern to anyone external. Protect is an independent whistleblowing charity which operates a confidential helpline. Their contact details are: Helpline: (020) 3117 2520; Website: <https://protect-advice.org.uk/contact-protect-advice-line/>.

Remember, too, that social media sites such as ['X', Bluesky, Instagram and Facebook] are public rather than private spaces, and they are not the appropriate channel for raising concerns.

It will very rarely, if ever, be appropriate to alert the media.

Dealing with allegations of wrongdoing

If you disclose information in accordance with this policy, wherever reasonably practicable we will keep your identity confidential, if that is what you would like. We discourage anonymous disclosures (although we will still make every effort to investigate such disclosures), as proper investigation may be more difficult or impossible if we cannot obtain further information from you.

We will arrange a meeting with you as soon as possible to discuss your concern (unless you make an anonymous disclosure). We will investigate your allegation promptly. We may require your assistance during our investigation.

We will aim to keep you informed of the progress of the investigation and its likely timescale. We will aim to inform you of the outcome of the investigation as soon as practicable, and whatever action (if any) we consider to be appropriate. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation, the outcome and/or any disciplinary action taken as a result (see further below, concerning confidentiality).

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.

If you are not happy with the way in which your concern has been handled, you can raise it with *[job title of most senior level of the company, such as Chair of the Board]*.

At any meetings held under this policy, you may be accompanied by a colleague or a trade union official.

Protection and support for whistleblowers

No action will be taken against anyone who raises a genuine concern about wrongdoing in accordance with this policy.

We may take action, including where appropriate disciplinary action up to and including dismissal, against any person found to be:

- subjecting a person to a detriment or dismissing them for using this policy; or
- deterring a person from reporting genuine concerns under this policy, such as threatening or retaliating against them.

(Where the perpetrator is not an employee, the process we will follow will depend on the status of our relationship with them.)

If you believe you have received such treatment for using this policy, please tell [*designated person*] or [*alternative designated person*]. If the matter is not remedied, you should raise it formally under the **[Policy – grievance]** or, if appropriate, the **[Policy – anti-harassment and bullying]**.

Note that if we find that you have made false allegations maliciously under this policy, action may be taken against you, including where appropriate disciplinary action.

Confidentiality, data protection and record keeping

We aim to deal with allegations raised under this policy sensitively and with due respect for the privacy of the individuals involved. You should treat as confidential any information communicated in connection with an allegation made under this policy. If you are accompanied at any meeting under this policy by a colleague or trade union official, they must also respect the confidential nature of the meeting.

Conducting investigations and meetings under this policy involves us processing the personal data of the individuals concerned. We use this personal data in order to investigate and deal with whistleblowing allegations. Depending on the context, our legal grounds for doing so could be that it is necessary:

- to comply with our legal obligations and for the performance of the employment contract (for example, to investigate and deal with allegations of wrongdoing in accordance with our duties towards staff, including our duty of trust and confidence to our employees, or our duty to prevent sexual harassment at work).
- in our legitimate interest to deal effectively with whistleblowing allegations, whether you are the subject of them or are otherwise connected to the issues raised
- in our recognised legitimate interest to detect, investigate or prevent crime.

Special category data¹ and data relating to criminal offences or convictions may occasionally need to be processed under this policy – for example, if a staff member raises an allegation of wrongdoing in the company which involves the impact of a suspected health and safety breach s, or if a worker requires a reasonable adjustment to the operation of this policy to accommodate a disability. Depending on the context, our additional legal conditions for using such data are that this is necessary: to exercise legal rights/comply with legal obligations in relation to employment; to establish, exercise or defend legal claims; the individual making the disclosure has manifestly made the information public; or it is in the public interest to detect or prevent unlawful acts.

Where we take witness statements from staff with information about the allegations being investigated under this policy, such statements will be treated confidentially and will only be shared with individuals who need to be involved in the investigation and any follow-up action. This will ordinarily be HR and the person/people conducting investigations. In addition, if in the course of investigations under this policy it seems that misconduct has taken place which requires investigation under our **[Policy - disciplinary]**, witness statements taken under this policy may be used in any subsequent disciplinary matter and may therefore be shared with the person/people conducting investigations and hearings, as well as the employee whose conduct is the subject of disciplinary proceedings, to enable them to prepare for the hearing and respond to the allegations against them.

[We will ordinarily keep records of allegations raised under this policy for [12 months] from the date of completion of investigations and any follow-up action. However, there may also be circumstances in which it is appropriate for us to keep particular records under this policy for a longer period. In such circumstances, we will decide how long records should be retained in accordance with the criteria set out in [our main [employee/staff] privacy notice.]

More general information, including details of who your personal data is shared with, your rights under data protection law and who you should contact if you have any concerns is

¹ (i.e. personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sex life or sexual orientation, genetic data, or biometric data that is used to identify an individual)

contained in our employee/staff privacy notice, which can be accessed via *[insert link]* or a copy obtained from *[position]*.

Status of this policy

This policy does not give contractual rights to any individual. The company reserves the right to alter any of its terms at any time although we will notify you in writing of any changes.