



Whistle Blowing Policy

Policy Statement

The main purpose of the system is to provide you with ready access to a safe and effective means of reporting any matters which fall within the 'qualifying disclosures' below, regarding the Company and/or its employees and workers.

Should you discover a situation which falls within one of the qualifying disclosures below, you are free to decide to whom you should report the matter, in terms of their seniority/position within the Company.

If you are unsure of whether an incident warrants reporting, or if it should be in fact be reported initially to an external body, the issue can be discussed confidentially with the following Whistleblowing Charity who should be able to give you free confidential advice.

Public Concern at Work

Lincoln's Inn House

42 Kingsway

London

WC2B 6EN

Telephone:

Whistleblowing Advice Line: 020 7404 6609

General Enquiries: 020 3117 2520

Email:

UK Advice Line: whistle@pcaw.org.uk

Media enquiries: press@pcaw.org.uk

UK Services: services@pcaw.org.uk

Qualifying disclosures – if an employee is to be protected, the disclosure must be one covered by the Public Interest Disclosure Act 1998. A qualifying disclosure is a disclosure which, in the reasonable belief of the employee tends to show one or more of the following:

- That a criminal offence has been committed, is being committed, or is likely to be committed
- That a person has failed, is failing, or is likely to fail to comply with a particular legal obligation
- That an injustice has occurred, is occurring, or is likely to occur
- That the health or safety of any individual has been, is being, or is likely to be endangered
- That the environment has been, is being, or is likely to be damaged
- That bribery has been committed, is being committed, or is likely to be committed
- That information indicating the occurrence of any of the above has been, is being, or is likely to be deliberately concealed.

We will support employees who make confidential disclosures and protect them from reprisals or victimisation even if the allegation is later established to be unfounded, as long as the employee makes the disclosure with reasonable belief and the disclosure falls within one of the above qualifying categories. This also applies where the employee makes the disclosure with reasonable belief and falls within one of the above qualifying disclosures, but which turns out later not to have been justified. If the Company concludes that an employee has made false allegations maliciously or with a view to personal gain, the employee may be subject to disciplinary action.

This Policy should not be used for a complaint relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should follow the Company's Grievance Policy.



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It is acknowledged, that it is never easy to report a concern, particularly one which may relate to an unlawful act. However, you are urged to come forward with any concerns, at the earliest opportunity, so that matters can be dealt with promptly and effectively.

If this is down internally, you may wish to discuss the matter with your Manager, although this should in no way dissuade you from making a more formal report where appropriate.