**Whistleblowing Policy**

**Introduction**

You must report any fraud, misconduct or wrongdoing by anyone within our company so that it is appropriately dealt with. We encourage you to raise any concerns about the conduct of others in the business or how the business is run. This policy sets out how you may raise any concerns and how those concerns will be dealt with.

The law protects you and all employees who raise legitimate concerns about specified matters. These are called “qualifying disclosures”. A qualifying disclosure is one made in the public interest by a worker who has a reasonable belief that:

* a criminal offence;
* a miscarriage of justice;
* an act creating risk to health and safety;
* an act causing damage to the environment;
* a breach of any other legal obligation; or
* concealment of any of the above
* is being, has been, or is likely to be, committed.

It is unnecessary for you to have proof that such an act is being, has been, or is likely to be, committed a reasonable belief is sufficient. You have no responsibility for investigating the matter – it is our responsibility to ensure an investigation occurs.

If you make such a protected disclosure, you have the right not to be dismissed, subjected to any other detriment, or victimised, because you have made a disclosure.

We encourage you to raise your concerns under this procedure first. If you are trying to decide whether to raise a concern, you should discuss the issue with your line manager or HR.

**Whistleblowing Principles**

You should know the importance of preventing and eliminating wrongdoing at work. You should be watchful for illegal or unethical conduct and report anything of that nature that you become aware of.

If you raise a matter or issue under this procedure, it will be investigated thoroughly, promptly, and confidentially, and the outcome of the investigation will be reported back to you as the person who raised it.

You will not be victimised for raising a matter under this procedure. Your continued employment and future promotion or training opportunities will not be prejudiced because you have raised a legitimate concern. Victimisation of you for raising a qualified disclosure will be a disciplinary offence.

If misconduct is discovered due to any investigation under this procedure, the disciplinary procedure will be used, in addition to any appropriate external measures. Maliciously making a false allegation is a disciplinary offence.

An instruction to cover up wrongdoing is itself a disciplinary offence. If you are told not to raise or pursue any concern, even by a person in authority, such as a manager, you should not agree to remain silent. You should report the matter to the appropriate senior management.

This procedure is for disclosures about matters other than a breach of your contract of employment. If you are concerned that your contract is broken or likely to be, you should use the grievance procedure.

**Whistleblowing Procedure**

**First Instance**

In the first instance (unless you reasonably believe your line manager to be involved in the wrongdoing or for any other reason you do not wish to approach your line manager), your concerns should be raised with your line manager. If you believe your line manager to be involved, or for any reason, you do not wish to approach your line manager, then you should speak to HR.

**Investigation**

Your line manager will arrange an investigation into the matter (either by investigating the matter personally or immediately passing the issue to someone in a more senior position). The investigation may involve you and other relevant individuals giving a written statement. Any investigation will be carried out in accordance with the principles set out above. Your statement will be considered, and you will be asked to comment on any additional evidence obtained. Your line manager (or the person who carried out the investigation) will then report to the Board, which will then take any necessary action, including reporting the matter to any appropriate government department or regulatory agency. If disciplinary action is required, your line manager (or the person who carried out the investigation) will report the matter to HR and start the disciplinary procedure. After any investigation, you will be told the outcome of the investigation and what action has done or proposes to do about it. If no action is to be taken, the reason for this will be explained.

**Outcome**

If you are concerned that your line manager is involved in the wrongdoing, has failed to make a proper investigation, or has been unable to report the outcome, you should inform HR, who will arrange for another manager to review the investigation carried out, make any necessary enquiries, and make their report to us as detailed above. If, for any other reason, you do not wish to approach your line manager, you should also contact HR in the first instance. Any approach to us will be treated with the strictest confidence, and your identity will not be disclosed without your consent.

**Conclusion**

If you reasonably believe that the appropriate action still needs to be taken in concluding the above, you should report the matter to the proper authority. The legislation sets out a number of bodies to which qualifying disclosures may be made. These include:

* HM Revenue & Customs;
* the Financial Conduct Authority (formerly the Financial Services Authority);
* the Competition and Markets Authority;
* the Health and Safety Executive;
* the Environment Agency;
* the Independent Office for Police Conduct; and
* the Serious Fraud Office.