

Red Snapper Group

Whistleblowing Policy

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1. Introduction

We are committed to conducting our business with honesty and integrity, and we expect all employees to maintain similar high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.

The aims of this policy are to:

- Encourage employees to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- Provide employees with guidance as to how to raise those concerns.
- Reassure employees that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

This policy takes account of the Whistleblowing Arrangements Code of Practice issued by the British Standards Institute and Public Concern at Work. This policy is non-contractual in its effect and does not form part of normal terms and conditions of employment, unless otherwise stated in the employee's contract of employment.

2. What is whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- a) criminal activity
- b) miscarriages of justice
- c) danger to health and safety
- d) damage to the environment
- e) failure to comply with any legal or professional obligation or regulatory requirements
- f) financial fraud or mismanagement
- g) negligence
- h) unauthorised disclosure of confidential information
- i) the deliberate concealment of any of the above matters.

A **whistleblower** is a person who raises a genuine concern relating to any of the above. If employees have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a Whistleblowing concern) they should report it under this policy.

This policy should not be used for complaints relating to employee's own personal circumstances, such as the way they have been treated at work. In those cases the employee should use the Grievance Policy and Procedure or Harassment Policy as appropriate.

If employees are uncertain whether something is within the scope of this policy they should seek advice from their line manager.

3. Raising a whistleblowing concern

We hope that in many cases employees will be able to raise any concerns with their line manager. Employees may tell their line manager in person or put the matter in writing if they prefer. Both the employee and their line manager may be able to agree a way of resolving the employee's concern quickly and effectively. In some cases they may refer the matter to someone in the Company designated to deal with such matters.

However, where the matter is more serious, or the employee feels that their line manager has not addressed their concern, or the employee prefers not to raise it with them for any reason, they should raise it with Human Resources.

We will arrange a meeting with the employee as soon as possible to discuss their concern. Employees may bring a colleague or union representative to any meetings under this policy. Their companion must respect the confidentiality of the employee's disclosure and any subsequent investigation.

We will take down a written summary of the employee's concern and provide them with a copy after the meeting. We will also aim to give the employee an indication of how we propose to deal with the matter.

4. Confidentiality

We hope that employees will feel able to voice Whistleblowing concerns openly under this policy. However, if employees want to raise their concern confidentially, we will make every effort to keep their identity secret. If it is necessary for anyone investigating the employee's concern to know their identity, we will discuss this with the employee.

We do not encourage employees to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from the employee. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward and appropriate measures can then be taken to preserve confidentiality. If employees are in any doubt they can seek advice from Public Concern at Work, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

5. 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 employees should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for employees to report their concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage employees to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Public Concern at Work, also has a list of prescribed regulators for reporting certain types of concern.

Whistleblowing concerns usually relate to the conduct of our employees, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. In some circumstances, the law will protect the employee if they raise the matter with the third party directly. However, we encourage employees to report such concerns internally first. They should contact their line manager or another member of our management team for guidance.

6. Investigation and outcome

Once employees have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform the employee of the outcome of our assessment. Employees may be required to attend additional meetings in order to provide further information.

In some cases we may appoint an investigator or team of investigators including employees with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep employees informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving them specific details of the investigation or any disciplinary action taken as a result. Employees should treat any information about the investigation as confidential.

If we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower will be subject to disciplinary action.

7. If employees are not satisfied

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

If employees are not happy with the way in which their concern has been handled, they can raise it with another member of our management team or a Company official.

8. Protection and support for whistleblowers

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support employees who raise genuine concerns under this policy, even if they turn out to be mistaken.

Employees must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If employees believe that they have suffered any such treatment, they should inform a member of our management team or a Company official immediately. If the matter is not remedied they should raise it formally using our Grievance Procedure.

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.

9. Responsibility for the success of this policy

All employees are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed initially to their line manager.

Public Concern at Work
(Independent Whistleblowing charity)

Helpline: 0207 404 6609
E-mail: whistle@pcaw.co.uk
Website: www.pcaw.co.uk

10. Review

The Policy shall be updated on an annual basis by its policy owner. Revisions, however, may be made throughout the year in which the updated policy shall then be re-issued to all employees and third parties.

11. Formal Sign Off

This Policy has been formally reviewed and signed off by top management:



Martin Jerrold
Managing Director
Red Snapper
Group