

# PUBLIC INTEREST DISCLOSURE (WHISTLE BLOWING) POLICY

## A. PURPOSE

The Company encourages open communication. It is imperative that you report any conduct that you believe is inconsistent with our company policies, as well as any unethical, unlawful or unsafe situations. Reporting suspected malpractice is often called 'whistle blowing'.

## B. SCOPE

Employees paid via the company's permanent payroll. For the avoidance of doubt this policy does not apply to agency workers.

## C. DEFINITION OF MALPRACTICE

You should use this policy when you reasonably believe that a suspected malpractice poses a risk to the interests of others, or to the company. Some examples of malpractice are set out below (this list is not exhaustive).

- Fraud or other financial irregularities
- Bribery or corruption
- Misuse of sensitive information
- Undisclosed conflicts of interest
- Breaches of data protection standards
- Non-compliance with health and safety procedures.

You should also raise your concern under this policy if you reasonably believe that someone is deliberately concealing information on these sorts of matters. You should use the policy where you suspect malpractice on the part of:

- The company
- An employee of the company
- A customer of the company.

## D. PROCEDURE

(i) If you have a concern about malpractice, you should raise it in the first instance with your manager, who may be able to resolve the matter informally and locally.

(ii) If you cannot raise the issue with your manager (perhaps because it involves your manager), you should raise it with a relevant senior line manager.

(iii) When you have raised your concern the company will determine if it falls within the scope of this policy. If not, you will be advised on how best to progress your concerns eg by using the Grievance Procedure.

(iv) If your concern does fall within the scope of this policy, the person to whom you have reported the issue (or a suitable authorised person) will initially assess what action should be taken. This may involve an internal inquiry, or a more formal investigation. You will be told who is handling the matter, how you can contact him/her and whether further assistance may be needed.

Please be aware that the company may not be able to discuss details with you if they would infringe a duty of confidence owed to somebody else.

(v) If you are unsure whether to use this procedure, or if you want independent advice at

any stage, you can contact Public Concern at Work on 0207 404 6609. This is an independent charity, whose lawyers can give you free confidential advice at any stage about how to raise a concern about serious malpractice at work. Public Concern at Work will be able to advise you on this option, and on the circumstances in which you may be able to contact an outside body.

(vi) The company cannot guarantee that all matters will be responded to in the way that you would like, but every reasonable effort will be made to handle the matter fairly and properly. If you are unhappy with the company's response, you can raise your concern with the manager of the investigating manager. (vii) If, after an investigation, serious malpractice is identified, the company will inform the appropriate external bodies.

(viii) While the company would prefer you to raise your concern openly, you may request that your disclosure is raised in confidence under this policy. Where confidentiality is requested, the company will make every effort to resolve the concern without revealing your identity. If the situation arises where the company is unable to resolve the concern without revealing your identity, this will be discussed with you and the available options will be explained.

However, if you do not reveal to the company your name when raising a malpractice concern, it will be much more difficult for the company to look into the matter, to protect your position or to provide you with feedback on the progress of the matter. Therefore, whilst the company will consider presenting reports that do not disclose the name of the employee raising the concern; you should not attempt to use this policy anonymously.

Sean Curran  
**Director – Finance, Quality & Compliance**  
4<sup>th</sup> Feb 2020