



Whistleblowing Policy

Aims

Team members have a right to report and be protected when they identify things that aren't right, are illegal or if anyone at work is neglecting their duties, including:

- someone's health and safety is in danger
- damage to the environment
- a criminal offence
- the company isn't obeying the law (like not having the right insurance)
- covering up wrongdoing

This policy covers staff, associates and volunteers.

Procedure

Team Members may wish to report complaints or grievances about other team members and should follow the relevant company policy. If a team member wishes to whistleblow, they must be certain that one of the above conditions applies and inform their line manager.

In the event the above categories do not apply, the company's Complaints Policy would apply.

Provided one of the above categories applies, the CEO or line manager will lead the investigation into the complaint. They will keep the details of the whistleblower confidential within the framework of any legal or HR advice they receive at the time. They will consider whether to invoke the company's disciplinary process (including suspension) or to address the concern informally.

If an employee commits an extremely serious disciplinary offence, the company may dismiss them without prior warnings and without notice.

The team member the complaint is about will be informed within 24 hours of the complaint being received and may be suspended (as an impartial act).

The CEO or the line manager will follow the company's Disciplinary and Grievance Policy.

The whistleblower may not be given details of the outcome of the process, however, must be informed that action has taken place.

Protection of whistleblowers

The company will not tolerate any harassment or victimisation of a whistleblower (including informal pressures) and will take appropriate action to protect anyone raising a concern in good faith and will treat this as a serious disciplinary offence which will be dealt with under the disciplinary rules and procedure.

All concerns will be treated in confidence and every effort will be made not to reveal a whistleblower's identity if that is their wish. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of the disclosure without their help, so the whistleblower may be asked to come forward as a witness.

Untrue allegations

If a whistleblower makes an allegation in good faith and reasonably believing it to be true, but it is not confirmed by the investigation, the company will recognise they raised the concern. If however, an allegation is made frivolously, maliciously or for personal gain, appropriate action, that could include disciplinary action, may be taken.

Reporting to other bodies

A team member can tell another prescribed person or body (listed on the Government website) only if they think their employer:

- will cover it up
- would treat them unfairly if they complained
- hasn't sorted it out and they've already told them

Responsibility

All staff are responsible for ensuring that they follow the policy to the letter and show professionalism, at all times. If any member of staff feels that the procedure has not been followed or wishes to appeal the decision, then they must refer to the grievance policy.

Review

This policy will be reviewed annually.

September 2025