

PUBLIC DISCLOSURE POLICY & PROCEDURE

1 Purpose and Scope

- 1.1 Most organisations face the risk from time to time of things going wrong or of unknowingly harbouring malpractice.
- 1.2 The Company takes malpractice very seriously. We are committed to conducting our business with honesty and integrity and we expect all employees to maintain high standards too. We encourage open communication from all those who work for us and we want every employee to feel secure about raising concerns.
- 1.3 All employees have protection under 'whistleblowing' laws if they raise concerns in the correct way. This policy is designed to give them that opportunity and protection.
- 1.4 It does not matter if an individual who raises a concern is mistaken about it. Employees do not have to prove anything about the disclosures(s) they are making but they must reasonably believe that they are made in the public interest and that the information shared tends to show some (alleged) malpractice.
- 1.5 This policy applies to all employees and officers of the Company and to any other workers within the Company including agency workers, casual workers, volunteers, interns, and home workers.
- 1.6 This policy does not form part of any contract of employment, or any other contract and the Company may amend it at any time.

2 When to use this policy

- 2.1 There is a difference between whistleblowing and raising a grievance:
 - 2.1.1 whistleblowing is where an individual has a concern about a danger or illegality that has a public interest aspect to it, for example because it negatively impacts customers, third parties or the public generally; whereas.
 - 2.1.2 a grievance is a complaint that generally relates to an individual's own employment position or personal circumstances at work.
- 2.2 This policy does not set out the procedure that applies to general grievances. If an employee has a complaint about their own personal circumstances, then they should use the Company's Grievance Procedure instead.

3 Malpractice covered by this Policy

- 3.1 Whistleblowing is the reporting of suspected malpractice, wrongdoing, or a danger in relation to the Company's activities.
- 3.2 The kinds of (alleged) malpractice covered by this policy may include:
 - 3.2.1 criminal offences;
 - 3.2.2 miscarriages of justice;
 - 3.2.3 danger to the health and safety of any individual;
 - 3.2.4 damage to the environment;
 - 3.2.5 breach of any legal obligation;
 - 3.2.6 deliberately concealing any of the above.

4 Our Guarantee

- 4.1 The Company is committed to the principles set out in this policy. If an employee uses it to raise a concern, then the Company assures them that they will not suffer any form of retribution, retaliation, or detrimental treatment. The Company will treat their concern(s) seriously and act according to this policy.
- 4.2 If an individual asks for a matter to be treated in confidence, the Company will respect this request and, unless the law requires otherwise, will only make disclosures to third parties or other employees with the individual's consent.

5 Procedure for Raising a Concern

- 5.1 If an individual is concerned about any form of malpractice covered by this policy, they should normally raise the issue as soon as possible with their line manager.
- 5.2 If an individual feels they cannot tell their line manager for whatever reason, they should raise the issue in the first instance with Patrick Laming, Executive Director.
- 5.3 If an individual has raised concerns and is still concerned, or the matter is so serious that they feel they cannot discuss it with either of the two persons named above, they should raise the matter with the Company's Managing Director.
- 5.4 A concern can be raised by telephone, in person or in writing. It is preferable if it is made in writing wherever reasonably practicable. Although the employee raising a concern under the policy is not expected to prove the truth of their concern beyond doubt or provide evidence, they will generally need to provide the following information as a minimum:
 - 5.4.1 the nature of the concern and why they believe it to be true; and

- 5.4.2 the background and history of the concern (giving relevant dates where possible).
- 5.5 An employee may wish to consider discussing their concern with a colleague before raising it formally under this policy but remember that once the concern has been raised formally (alone or with a colleague), in the interests of everyone involved, the process is confidential.
- 5.6 The Company may, in its sole discretion, refer a concern raised to an external person or organisation for resolution.

6 Responding to Concerns Raised

- 6.1 The Company is committed to ensuring that all disclosures raised under this policy will be dealt with appropriately, consistently, fairly, and professionally.
- 6.2 The Company will seek to obtain all relevant material details of the concern as soon as possible. It may ask the employee concerned for further information about their disclosures at any stage during the process.
- 6.3 The Company will decide how to respond. Usually this will involve making internal enquiries first, but it may be necessary to carry out an investigation which may be formal or informal depending on the nature of the concern(s) raised.
- 6.4 The Company reserves the right in its sole discretion to bring in an external investigator where they consider this to be appropriate.
- 6.5 The Company will endeavour to complete investigations within a reasonable time.
- 6.6 The Company will keep the individual who raised the concern informed of the progress of the investigation carried out, when it is completed and give an indication of timings for any actions or next steps that the Company proposes to take. However, the Company will not be able to inform the individual of any matters which would infringe any duty of confidentiality owed to others.

7 Confidentiality

- 7.1 All concerns raised will be treated in confidence and every effort will be made not to reveal the identity of an individual who raises a concern 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 a disclosure without the help of the employee who raised the concern, so he/she may be asked to come forward as a witness. If they agree to this, they will be offered advice and support.
- 7.2 The Company hopes that all employees will feel able to voice their concerns openly under this policy. Although a concern may be made anonymously, the Company encourages individuals to put their name to their allegation whenever possible. If this is not done, it will be much more difficult for the Company to protect the individual's position or to give feedback on the outcome of investigations.
- 7.3 Concerns that are expressed completely anonymously are much less powerful and are difficult to investigate. The Company will consider them at its sole discretion, taking into account factors

such as the seriousness of the issue raised, the credibility of the concern and the likelihood of confirming the allegation from other sources.

8 Raising your concern Externally (exceptional cases)

- 8.1 The main purpose of this policy is to give all our employees the opportunity and protection they need to raise concerns internally. The Company would expect that in almost all cases raising concerns internally would be the most appropriate course of action.
- 8.2 However, if for whatever reason, an employee feels they cannot raise their concerns internally and they reasonably believe the information and any allegations are substantially true, the law recognises that it may be appropriate for them to raise the matter with another prescribed person, such as a regulator or professional body or an MP. A list of the relevant prescribed people and bodies for this purpose and the areas for which they are responsible is available on the GOV.UK website at <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2>.
- 8.3 The Company strongly encourages any employee to seek appropriate advice before reporting a concern to anyone external so that they may be aware of the potential consequences of making a possibly unprotected disclosure.

9 Protection and Support for those Raising Concerns

- 9.1 The Company is committed to good practice and high standards and to being supportive to employees who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 9.2 Any employee raising a genuine concern in good faith must not suffer any detriment as a result of doing so. If they believe that they have suffered such treatment, they should in the first instance, inform Patrick Laming, Executive Director at the earliest opportunity. If the matter is not dealt with to the individual's satisfaction, the individual should raise it formally using the Company's Grievance Procedure.
- 9.3 No officer or employee of the Company must threaten or retaliate against an employee who has raised a concern under this policy. Indeed, the Company will not tolerate any harassment or victimisation. Any person involved in such conduct may be subject to disciplinary action which, if sufficiently serious, may result in summary dismissal for gross misconduct. In some cases, the employee responsible may also be liable to a claim for compensation brought against them personally.
- 9.4 However, to ensure the protection of all our employees, those who raise a concern frivolously, maliciously and/or for personal gain and/or make an allegation they do not reasonably believe to be true and/or made in the public interest will also be liable to disciplinary action which, if sufficiently serious, may result in summary dismissal for gross misconduct.

10 Further information and contacts

- 10.1 In the first instance, please contact Patrick Laming, Executive Director.

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