

Whistleblowing Policy

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Introduction

Red Snapper (the 'Company') is 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.
- Encourage employees who have serious concerns about any aspect at the Company to come forward and voice those concerns.
- Encourage employees to feel confident in raising serious concerns at the earliest opportunity
- Ensure concerns are taken seriously and responded to in the correct manner
- Reassure employees that they are protected from possible reprisals or victimisation if a disclosure is made in good faith
- 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 'Protect'. Whistleblowing law is located in the Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998).

The policy is in place to ensure that employees can raise concerns about wrongdoing or malpractice within the Company without fear of victimisation, subsequent discrimination, disadvantage or dismissal. It is intended to encourage and enable employees to raise serious concerns within, rather than ignoring the problem or 'blowing the whistle' externally.

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.

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, Sexual Harassment or Anti-Harassment and Bullying Policy as appropriate.

Employees who raise genuine issues have nothing to fear as it is the rightful duty to the Company, colleagues and to whom the Company provides our services. The Company will not tolerate any harassment or victimisation of a whistleblower and will take appropriate action to protect individuals when a concern is raised in good faith. Any proven wrong doing is treated as a serious disciplinary offence and will be dealt with under the Disciplinary Policy and Procedures.

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

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.

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 'Protect', the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

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, 'Protect', 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.

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 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.

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.

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 Policy and 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.

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.

Protect (formally Public Concern at Work PCaW)

Helpline: 020 3117 2520

(Independent Whistleblowing charity)

E-mail: via website

Website: <https://protect-advice.org.uk/>

NSPCC Whistleblowing Advice Line

0800 028 0285

The NSPCC Whistleblowing Advice Line offers free advice and support to professionals with concerns about how **child protection issues** are being handled in their own or another organisation.

Email: help@nspcc.org.uk

Formal sign off

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

A handwritten signature in black ink, appearing to be 'M. Jerrold', written on a light blue rectangular background.

Martin Jerrold
Managing Director
Red Snapper Group

End.