**Whistleblowing Policy**

***\* Add/delete іnfоrmаtіоn in brасkеtѕ as аррrорrіаtе***

**Aims:**

* Understand what our procedures are for whistle blowing
* Know the different stages of the Procedure

If you become aware of any criminal offence or other wrongdoing in the workplace, you should report it immediately. If the wrongdoing gives rise to a personal grievance, you may raise the matter under the company’s formal grievance procedure. Alternatively, if you simply wish to disclose a wrongdoing without raising a personal grievance, you may use the following whistle blowing procedure.

This procedure is not legally binding and does not form part of your contract of employment.

**We protect whistleblowers**

There are no reprisals for mistakes or if following our investigations, (which we will always conduct thoroughly and conscientiously), we conclude that there has been no breach of law, policy or unethical conduct. However, to qualify for protection, the disclosure must, in the **reasonable belief** of the worker making the disclosure, show that one or more of the following events has happened, is happening or is likely to happen and that it is in the public interest to make the disclosure:

* A criminal offence
* Failure to comply with any legal obligation
* Miscarriage of justice
* Danger to health & safety of any individual
* Danger to the environment, or,
* Deliberate concealment of any of any of the above.

If at any time, you do not feel that you have been fairly or properly treated by us in the handling of your whistleblowing concern, you must inform us immediately. You should inform specify designated contact in the first instance; and if you are not satisfied with the outcome of that conversation, you should follow the process set out in our grievance policy.

We also protect whistleblowers from others, so where a whistleblower reports to us that they have been treated inappropriately by others, (including having received threats as a result of raising their concerns), we will take disciplinary action against those individuals. The consequences of us taking this action could include dismissal of such individual(s) for gross misconduct. Whistleblowers may also be entitled to take legal action against those individuals.

**Whistleblowing to others outside of [name of business]**

Our policy covers the process for raising, investigating, and resolving wrongdoing within name of business’s workplace.

The whistleblowing procedure that we have carefully put in place has been designed to ensure that to the best of our ability, we are able to resolve any concerns raised and to protect you as part of this process.

For these reasons, we anticipate that it would be extremely rare, if ever necessary, for you needing to involve anyone outside of name of business as part of this process.

However, we recognise that potentially, in exceptional circumstances, you might wish to involve an external body – an industry regulator, for example – and/or the independent charity Public Concern at Work, who can direct you towards the appropriate regulator for the type of issue you want to raise.

**Involving the press/media**

Involving the media in a whistleblowing matter often has the effect of inflaming the situation, not assisting it. It can significantly hamper evidence gathering and the willingness of other relevant individuals to support the process.

We therefore strongly discourage you from involving the media. We will treat any contact with the press as a serious disciplinary issue justifying dismissal unless exceptional circumstances exist. For example, we would generally expect you to have taken all reasonable steps to deal with the matter internally, or with an external regulator, and to have taken advice from a lawyer, before you could justify involving the press.

**Whistleblowing procedure**

The Company has instituted a system for reporting information which in your reasonable belief points to a wrongdoing at work.

A wrongdoing is any of the following:

* a **criminal offence** has been or is likely to be committed;
* a person has failed, is failing or is likely to fail to **comply with a legal obligation**;
* a **miscarriage of justice** has happened, is happening or is likely to happen;
* the **health and safety of an individual** has been, is being or is likely to be damaged;
* **damage to the environment** has occurred, is occurring or is likely to occur;
* **information showing any of the above** has been, is being or is likely to be deliberately concealed.

The Company wishes to ensure that any such wrongdoings are reported and dealt with. If you become aware of a wrongdoing at work, then please follow the procedure below immediately. If you believe that the Company’s managers may be involved in the wrongdoing, then please approach the [Managing Director] directly.

**Procedure**

Please follow this procedure:

* Raise your concerns with [specify designated contact] in the first instance. You may do so in writing or in person.
* If you would prefer not to discuss your concerns with [specify designated contact], or you consider that your concerns are extremely serious, you should write to [name one of the company’s directors/appropriate alternative at similar level].
* Please explain that you are raising your concerns as part of the name of business whistleblowing policy and procedure. Then set out all the key facts, including names of those involved and all relevant dates.
* You will be invited to a meeting at which you can discuss your concerns. You are entitled to bring someone with you to this meeting – and any subsequent meetings. That companion may be a colleague (or a trade union representative, if relevant). Anyone who accompanies you will be asked to agree to keep strictly confidential the contents of the meeting including any materials disclosed and/or examined during it. This obligation of confidentiality will extend before, during and after the meeting and any following investigation that we conduct in relation to the concerns raised by you.
* Following this meeting, we will investigate the matters raised and we may request that you come to additional meetings to assist us in our efforts. We may also decide to involve relevant external (or internal) specialists to help us conduct a thorough, fair and responsible investigation.
* Our relevant personnel involved in this investigation will keep you informed about the progress of the investigation as far as they are able. For a number of reasons, generally relating to legal obligations, including obligations of confidence, to others, or in relation to any legal advice that we may decide to take on our own behalf, we may not be able to share every detail of our discoveries or deliberations with you. We will always endeavour, however, to reassure you, as best as we can, of the fact that we are taking your concerns seriously and that we are conducting a responsible investigation.
* It is possible that the outcome of our investigations will not be one that you find satisfactory. If this happens, you are entitled to complain to name one of the company’s directors/appropriate alternative at similar level and request a review of what has been done and concluded.

If you have raised a concern in good faith, our process and all those involved in giving effect to it will support and protect you. However, if a false concern is raised with us in bad faith (e.g. for malicious reasons), we will invoke our disciplinary policy and you may be subject to disciplinary action.

**Victimisation**

The Company will not tolerate the victimisation of any person who discloses a wrongdoing under this procedure. Any such victimisation will be treated as a disciplinary offence.