

Subject : Whistleblowing Policy & Procedure			Doc. # : HR-P-041
Originator : Louise Workman, HR Manager	Mod. Date : 12/07/2026	Rev. Date : 12/07/2027	Version#: 3

WHISTLEBLOWING POLICY & PROCEDURE

1. Introduction

Whistleblowing is where an employee raises concerns about underhand or illegal practices within his or her organisation. The Company's policy is to operate within the country's laws and regulations, and all employees are expected to co-operate in this by adhering to all laws, regulations, policies and procedures.

The Company is committed to maintaining an open culture with the highest standards of honesty and accountability, where employees can report any legitimate concerns in confidence. The company takes all malpractice very seriously, and this document sets out the procedure by which employees can report any concerns.

The Company offers protection to any employee who honestly and reasonably believes that underhand or illegal practices are taking place. The Company undertakes to comply with all applicable laws relating to the prohibition of retaliation against food-faith whistle-blowers; see the Public Interest Disclosure Act 1988, which gives workers who whistle blow protection against victimisation or dismissal.

Assuming the requirements of this policy have been met, the Company undertakes to protect the employee from any personal claims and from any victimisation, harassment or bullying occasioned as a result of his or her disclosure. The Company also undertakes not to initiate any disciplinary action. The aim is that the career of any employee should not in any way be harmed or hindered as a result of his or her disclosure (whether the item reported proves to be true or not, provided the reporting was carried out in good faith and with genuine belief).

Any reprisal or similar action taken against a discloser because he or she has made a protected disclosure under this policy may be regarded as gross misconduct and may result in disciplinary action.

2. Aims and Scope of this Policy

This policy aims to:-

- Encourage you to feel confident in raising serious concerns and to question and act upon concerns about practice
- Provide avenues for you to raise those concerns and receive feedback on any action taken
- Ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied
- Reassure you that you will be protected from possible reprisals or victimisation if you have a reasonable belief that you have made any disclosure in good faith

If you are an employee, there are existing procedures in place to enable you to lodge a grievance relating to your own employment. You should always use the grievance procedure before this Whistleblowing Policy. The Whistleblowing Policy is intended to cover major concerns that fall outside the scope of other procedures. These include:-

- Conduct which is an offence or a breach of law
- Disclosures related to miscarriages of justice
- Health and safety risks, including risks to the public, service users, as well as other employees
- A failure to comply with a legal obligation
- Possible fraud and corruption
- Possible corruption and bribery
- Abuse of clients, or
- Other unethical conduct

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3. Safeguards Against Harassment or Victimisation

The Company is committed to good practice and high standards and wants to be supportive of employees and others covered by this policy.

The Company recognises that the decision to report a concern can be a difficult one to make.

The Company will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action, including disciplinary action if necessary, to protect you when you raise a concern in good faith.

Any investigation into allegations of potential malpractice will not influence or be influenced by other procedures such as investigations and hearings under the disciplinary, sickness, capability, redundancy or any other dismissal procedures that already affect you or may affect you in the future.

4. Confidentiality

The investigating manager will take every possible steps to maintain the anonymity of the employee who has made the allegation and any other associated employees.

5. Anonymous Allegations

This policy encourages you to put your name to your allegation whenever possible. Concerns expressed anonymously are much less powerful but will be considered at the discretion of the Company. It should be remembered that wherever possible confidentiality will be preserved.

In exercising this discretion the factors to be taken into account would include:-

- The seriousness of the issues raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

6. Untrue Allegations

If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken. If, however, you make an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against you.

7. Customer Whistleblowing Initiatives

In addition to the Company reporting routes set out in this policy, employees may use the OSI Make It Right Global Employee Hotline or any independent whistleblowing initiative operated by one of our customers. The Make It Right scheme provides an independent reporting service for employees who wish to raise concerns about suspected unethical, illegal or unsafe activity, particularly where they do not feel comfortable raising the matter directly with management. Reports may be made anonymously, where permitted by law. Details of the Make It Right scheme, customer whistleblowing initiatives and how to make a report are displayed on the site noticeboards. Employees who raise a genuine concern through any of these reporting channels will not be subjected to retaliation, harassment or victimisation by the Company.

8. How to Raise a Concern

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As a first step, you should normally raise concerns with your immediate line manager or supervisor. In some cases it may be more appropriate to raise concerns with someone more senior. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if you believe that your management is involved, you should approach the HR Manager or General Manager (on telephone number 01952 605900).

Concerns may be raised verbally or in writing. If you wish to make a written report, please include the following information:

- The background and history of the concern (giving relevant dates)
- The reason why you are particularly concerned about the situation.

If your concern is raised verbally, a written note will be taken in line with the format above.

The earlier you express the concern the easier it is to take the action.

Although you are not expected to prove beyond doubt the truth of an allegation, you will need to demonstrate to the person contacted that there are reasonable grounds for your concern.

You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or have the same concerns.

You may invite your trade union representative or a work colleague to be present during any meetings or interviews in conjunction with the concerns you have raised.

9. How the Company will Respond

The person to whom you report your concerns under this policy must, in turn, report them to the Monitoring Officer within five working days.

Where appropriate, the matters raised may:-

- Be investigated by management or through the disciplinary process
- Be referred to the police
- Be referred to the external auditor
- Form the subject of an independent inquiry

Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required this will be taken before any investigation is conducted.

Within ten working days of a concern being raised, the Monitoring Officer will write to you with the following information.

- Acknowledge that the concern has been received
- Indicating how the Company proposes to deal with the matter
- Giving an estimate of how long it will take to provide a final response
- Informing you whether any initial enquiries have been made:-
- Supplying you with information on support available, and
- Informing you whether further investigations will take place and if not, why not

The amount of contact between the officers considering the issues and you will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, the Company will seek further information from you.

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Where any meeting is arranged, off-site if you so wish, you can be accompanied by a union representative or a work colleague.

The Company will take steps to minimise any difficulties which you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings, the Company will arrange for you to receive advice about the procedure.

The Company accepts that you need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform you of the outcome of any investigation but you must keep that information confidential.

Any data that is collated relevant to the allegation / investigation will remain confidential and kept on file for a limited period only.

10. Responsible Officer

The Monitoring Officer has overall responsibility for the maintenance and operation of this policy. That officer maintains a record of concerns raised and the outcomes (but in a form which does not endanger your confidentiality) and will report as necessary to the Company.