**About this policy**

We are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.

This policy covers all employees, officers, consultants, contractors, casual workers and agency workers.

This policy does not form part of any employee's contract of employment or other contract to provide services, and we may amend it at any time.

**What is Whistleblowing?**

Whistleblowing is the reporting of information which relates to suspected wrongdoing or dangers at work. This may include but is not limited to:

* criminal activity;
* failure to comply with any legal or professional obligation or regulatory requirements;
* miscarriages of justice;
* danger to health and safety;
* damage to the environment;
* bribery;
* financial fraud or mismanagement; or
* the deliberate concealment of any of the above matters.

A whistle-blower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities you should report it under this policy. However, you should not use this policy to make complaints relating to your own personal circumstances (e.g. the way you have been treated in work). Instead, you should raise a grievance using the Grievance Policy.

**Raising a Whistleblowing Concern**

We hope that in many cases you will be able to raise any concerns with your manager either in person or in writing. However, in some circumstances we recognise that it may not be appropriate to raise a concern with your manager. In these circumstances, you should contact either:

* The Whistleblowing Officer.
* The Chief People Officer or the HR Director.

You will need to provide the following information:

* the nature of your concern and why you believe it to be true; and
* the background and history of the concern (giving relevant dates).

Although you are not expected to prove beyond doubt the truth of your suspicion, you will need to demonstrate to the person contacted that you have a genuine concern relating to suspected wrongdoing or malpractice within the company and there are reasonable grounds for your concern.

A meeting will be arranged with you as soon as possible to discuss your concerns. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

We will provide you with a written summary of the meeting and will aim to give you an indication of how we propose to deal with the matter.

**Confidentiality**

If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern. However, we do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Please let us know if you are concerned about possible reprisals if your identity is revealed and appropriate measures can then be taken to preserve confidentiality.

If you are unsure as to what to do, you can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline: 020 7404 6609.

**Investigation and Outcome**

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

In some cases we may appoint an investigator or team of investigators including staff 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 you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any action taken as a result. You should treat any information about the investigation as confidential.

**Untrue allegations**

We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

If we conclude that a whistle-blower has made false allegations maliciously or with a view to personal gain, we will consider taking disciplinary action.

**External Disclosures**

In some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern.

Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first. You should contact your manager or one of the other individuals set out in this policy for guidance.

**Protection and Support for Whistle-blowers**

Whistle-blowers 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 you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer, Chief People Officer or HR Director immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.

You must not threaten or retaliate against whistle-blowers in any way. If you are involved in such conduct, you may be subject to disciplinary action.