

TO WHOM IT MAY CONCERN

Excerpt from Staff Handbook 2021

25. Whistleblowing

The Public Interest Disclosure Act 1998 protects workers who blow the whistle about wrongdoing. All employees are expected to maintain the highest standards of integrity and good faith. This Policy is intended to provide you with guidance as to the circumstances under which such protection is available and the steps to be taken should you feel that a matter of public interest is at stake.

Although disclosure may be made to certain public authorities, the conditions under which this may be done in order for the employee to be protected are strictly limited. The Company's policy is therefore that disclosures should be made in the first instance to the Company. Your failure to do so may lead us, and a court, to conclude that the disclosure was not made in good faith.

The Nature of the Disclosure

Only certain kinds of disclosure qualify for protection and are therefore termed "qualifying disclosures". They are disclosures which, in the reasonable belief of the worker making the disclosure, tend to show one or more of the following:

- a criminal offence
- the breach of a legal obligation
- a miscarriage of justice
- danger to the health and safety of any individual
- damage to the environment
- that information of the type set out above has been or is likely to be deliberately concealed.

If you become aware of any information of this nature which causes you concern, you may wish to raise the matter informally with your Manager and discuss with her the next steps which should be taken. If you prefer, you may disclose the information formally to your Manager, or to the appropriate level of management within the Company.

The Company will ensure that any disclosure made is kept as confidential as possible; however, you should be aware that it may be necessary to divulge such information during the course of any investigation. If an investigation into the allegations is thought necessary, you will be informed that the allegations will be put to the person accused of wrongdoing.

You will be informed of the progress and outcome of any investigation into the allegations.

If you are unhappy with the way in which your disclosure is received or dealt with, you should immediately raise that concern at the highest level within the Company. The Company is committed to ensuring that no employee is subjected to any detriment, or victimised, by reason of having made a protected disclosure in good faith, and will do everything within its power to investigate the matter fully and take appropriate action against any wrongdoer. You should also be aware that provided certain conditions are met, you are protected by the law against suffering any detriment – for example dismissal – by reason of having made the disclosure.

However, if you make a disclosure which you do not believe or which is made maliciously or with some ulterior motive (such as a grudge against a fellow employee), this may be treated as a disciplinary matter to be dealt with under the Disciplinary Procedure.