



Whistleblowing Policy

Authorised by:

AS Thomis
Chief Executive

1. About This Policy

- 1.1. 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.
- 1.2. This policy covers all employees, officers, consultants, contractors, interns, casual workers and agency workers.
- 1.3. This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. What Is Whistleblowing?

- 2.1. Whistleblowing is the reporting or disclosure of suspected wrongdoing or dangers in relation to our activities. This may include bribery, facilitation of tax evasion, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.
- 2.2. A whistleblower 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 (a whistleblowing concern) you should report it under this policy.
- 2.3. This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases you should use the grievance procedure.

3. How To Raise A Concern

- 3.1. We hope that in many cases you will be able to raise any concerns with your manager. However, where you prefer not to raise it with your manager for any reason, you should contact the Chief Executive or SafeCall who provide a professional, independent and confidential means of reporting your concerns. Contact details are at the end of this policy.
- 3.2. We will arrange a meeting with you as soon as possible to discuss your concern. 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.
- 3.3. We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

4. Confidentiality

- 4.1. We hope that staff will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. 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.
- 4.2. 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. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Chief Executive.

5. Investigation And Outcome

- 5.1. Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. You may be required to attend additional meetings in order to provide further information.
- 5.2. 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 disciplinary action taken as a result. You should treat any information about the investigation as confidential.
- 5.3. 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.

6. If You Are Not Satisfied

- 6.1. While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.
- 6.2. If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts in paragraph 9.

7. External Disclosures

- 7.1. The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

- 7.2. The law recognises that 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. Protect, the independent UK whistleblowing charity (formerly Public Concern at Work) operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.
- 7.3. Whistleblowing concerns usually relate to the conduct of our staff, 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 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 line manager or one of the other individuals set out in paragraph 9 for guidance.

8. Protection And Support For Whistleblowers

- 8.1. We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 8.2. Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the Group Head of HR immediately.
- 8.3. You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action.
- 8.4. However, if we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.

9. Contacts

Chief Executive	Andy Thomis 0118 909 0390 athomis@cohortplc.com
SafeCall (confidential helpline)	SafeCall 0800 915 1571 cohort@safecall.co.uk

	www.safecall.co.uk/report
Protect (Independent whistleblowing charity)	Helpline: (020) 3117 2520 Website: https://protect-advice.org.uk

Andrew S Thomis
Chief Executive

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Change History

Version	Date	Comments
1.0	Jan 2018	Initial issue in draft
2.0	September 2020	Update to reflect change to external charity. New clauses 1.2, 2.2, 2.3. Other minor changes.