

## Whistle Blowing Policy

### Policy Statement

The Whistle Blowing Policy is in line with the Public Interest Disclosure Act (now referred to as The Whistle Blowing Policy) which came into effect on 2<sup>nd</sup> July 1999. This policy primarily addresses the concerns and interests of individual employees and the company. It is aimed at helping employees who have major concerns over any wrongdoing within the company relating to unlawful conduct, financial malpractice or danger to the public or the environment.

Specific examples could include: -

- A criminal offence (e.g. fraud or theft) has been / is likely to be committed
- A miscarriage of justice has been / is likely to occur
- The health and safety of any individual has been / is likely to be endangered
- The environment has been / is likely to be damaged
- Public funds are being used in an unauthorised manner
- Sexual or physical abuse of any member of staff or customer is taking place
- Discrimination is occurring to a member of staff or customer on grounds of sex, race or disability
- Any other form of improper action or conduct is taking place
- Information relating to any of the above is being deliberately (or attempted to be) concealed

### Statement of Principles

**To provide an environment which will enable employees to raise their concerns without prejudice or discrimination?**

- We will ensure employees are able to raise their concerns about malpractice(s) at an early stage and in line with company policies and procedures
- We would prefer issues to be raised when there is a concern rather than wait for concrete proof
- We will ensure that this policy is used if something is troubling an employee, which the management should know about, or need to look into
- We will encourage employees to feel confident about raising and acting upon any concerns
- We will provide a procedure for employees to raise those concerns and receive feedback on any action taken
- We will ensure that employees receive a response in relations to their concerns, and that they are aware of how to pursue them, and that they know what to do if they are not satisfied with the outcome
- We will reassure employees that if they raise any concerns in good faith and reasonably believe them to be true, they will be protected from possible reprisals or victimisation

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### **To ensure that all staff will be protected in line with company policies and procedures**

- We will ensure that when a concern is raised under this policy an employee will not be at risk of losing their job or suffer from any kind of retribution as a result
- We will ensure that any investigation into allegations of potential malpractice, will not influence, or be influenced by any disciplinary or redundancy procedures already taking place concerning the employee
- We will ensure any allegations and information provided is accurate and the employee is not acting for personal gain, ensuring the disclosure is made in good faith
- We will not tolerate the harassment or victimisation of anyone raising a genuine concern
- We recognise that an employee may want to raise a concern in confidence under this policy. If this is the case their identification will be protected, and will not be disclosed without their consent
- We will ensure that if a situation arises where we are not able to resolve the concern without revealing an employee's identity, for example if evidence was needed in court, we will discuss whether and how we can proceed
- We will find it more difficult to investigate a concern, protect an employee's position, or give feedback if their identity is not revealed
- We will endeavor to consider all issues; however, the nature of the policy is not well suited to concerns raised anonymously

### **To comply with current government legislation**

- Crime
  - Illegality
  - Miscarriage of justice
  - Damage to health and safety
  - Damage to the environment
  - Possible fraud and corruption
  - Sexual or physical abuse of clients
  - Other unethical conduct
- We will ensure that Standguide's policy covers and protects employee disclosures under the Public Interest Disclosure Act 1998, which are outlined below:
  - We will ensure that Standguide's procedure provides a structured and coherent process to enable the policy to be implemented across all provision

## Explanation of Key Terms

<b>Whistle Blowing Policy</b>	The Public Interest Disclosure Act 1998
<b>All employees</b>	Permanent, temporary, sessional, full-time, part-time and fixed-term staff
<b>Company policies and procedures</b>	All company policies, systems and procedures which are accessible from the Standguide Intranet. The Employee Handbook which outlines all Personnel systems and procedures.

## Responsibilities and Duties

All staff have a responsibility to ensure the successful implementation of the Whistle Blowing Policy.

All staff have a responsibility to comply with the Whistle Blowing Procedure.

All line managers have a responsibility for ensuring the Whistle Blowing Policy and Procedure are implemented across all districts.

The Head Office Manager, as a result of cross company meetings, will review, evaluate and approve the whistle blowing policy and procedure.

## Company Procedures

Company policies and procedures identify all courses of action underpinning the policy. It is not intended that this policy be used where others are more appropriate for example:

- Grievances – see procedure in the Employee Handbook
- Complaints – see procedure on the company intranet
- Anti-Bullying and Harassment – see policy and procedure on the company intranet
- Equality & Diversity – see policy and procedure on the company intranet

## Monitoring Arrangements

The policy and associated procedure will be managed by the Head Office Manager as a result of cross company meetings. All meetings feed into the Senior Leadership Team. The Senior Leadership Team has overall responsibility for creating an ethos and environment that reflects the policy.

## Review Procedures

The Senior Leadership Team will ratify the policy.

**Review Date: October 2021**