Whistleblowing Policy

Applies to	All employees, workers, officers, contractors, consultants, interns, volunteers and agency workers
Policy owner	HR Manager
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We aim to maintain high standards of integrity in everything we do. If you become aware of conduct that is dangerous, illegal, unethical or otherwise seriously wrong, we want you to feel able to report it - and we will take what you tell us seriously.

This is called whistleblowing. This policy explains what whistleblowing is, how to raise a concern, and how we will protect you for doing so.

This policy does not form part of your contract of employment. We reserve the right to amend it.

1. What is whistleblowing?

Whistleblowing is the reporting of serious wrongdoing that is in the public interest - not a complaint about something that affects you personally. If your concern is about how you are being treated at work, please refer to our Grievance Policy or Harassment and Bullying Policy instead.

The types of concern that may amount to whistleblowing include:

- criminal activity of any kind
- a failure to comply with any legal, professional or regulatory obligation
- a risk to health and safety
- damage or risk of damage to the environment
- financial fraud, mismanagement or misuse of funds
- facilitation of tax evasion
- a breach of our Bribery Policy
- sexual harassment that has occurred, is occurring or is likely to occur
- an attempt to conceal or cover up any of the above

If you are not sure whether your concern falls within this policy, speak to your line manager, the HR Manager or a Senior Director. It is better to raise something and find out than to stay silent about a genuine concern.

The law protects workers who make a qualifying disclosure - that is, a disclosure that reasonably shows one of the matters listed above. You are protected even if your concern turns out to be mistaken, as long as you raised it in good faith.

2. How to raise a concern

Informal step

In most cases, start by speaking to your line manager. This can be done informally and does not need to be in writing. If the concern involves your line manager, or is of a very serious nature, go directly to any Senior Director.

Formal disclosure

If the matter cannot be resolved informally, or you prefer to go straight to a formal approach, put your concern in writing. Address it to a Senior Director or the COO. Your letter or email should:

- state clearly that you are raising a concern under the Whistleblowing Policy
- describe the concern in as much detail as possible
- include relevant facts, dates, times and the names of anyone involved
- set out any evidence you have, or tell us where we can find it

We will acknowledge your concern promptly and invite you to a meeting to discuss it. You have the right to be accompanied at that meeting - and any subsequent meetings - by a colleague or trade union representative. We will ask you and your companion to keep the matter confidential while the investigation is ongoing.

Investigation and outcome

We will investigate your concern fully and fairly. Depending on its nature, this may involve specialists with relevant knowledge or experience. We will keep you informed of our progress in general terms throughout the investigation. There may be aspects we cannot share with you in detail - for example, because of confidentiality obligations to others involved - but we will tell you when that is the case and explain why.

We will confirm the outcome of the investigation to you as far as we are able. We cannot guarantee the outcome will be the one you hoped for, but we can guarantee that we will take your concern seriously.

If you are dissatisfied with how your concern has been handled, you can raise this with any Senior Director or Board Director.

3. Confidentiality and anonymity

There is an important difference between keeping your identity confidential and making a disclosure anonymously.

We actively discourage anonymous disclosures. An anonymous report is very difficult to investigate - we cannot ask for clarification, test the credibility of the allegations or follow up with the person who raised the concern.

This often makes it impossible to reach a well-informed conclusion, which means the concern may never be properly addressed.

If you are worried about raising a concern openly, please tell us. We will do everything we can to protect your identity throughout the process. There may be circumstances where we need to disclose your identity to those involved in the investigation - but we will always discuss this with you first and explain why, before doing so.

In addition, we have included a confidential Whistleblowing and Disclosure service with our EAP provider, Health Assured (Wisdom App) For more details on this, contact the HR Manager.

4. How we protect you

If you raise a genuine concern under this policy, you will not face any adverse treatment as a result - even if the investigation finds that you were mistaken. We will not dismiss you or treat you less favourably for whistleblowing in good faith.

If you believe you have been treated badly after raising a concern - whether by the business, a manager or a colleague - tell us immediately. Speak to your line manager in the first instance, and if the matter is not resolved, raise a formal grievance under our Grievance Policy.

You must not treat others badly or threaten them for raising concerns under this policy. Doing so may result in disciplinary action, up to and including dismissal for gross misconduct. The whistleblower may also be able to bring a legal claim against you personally.

For independent advice on whistleblowing, confidentiality and your legal protections, you can contact Protect - an independent charity that supports whistleblowers. Their website is protect-advice.org.uk and their advice line is 020 3117 2520.

5. Going outside the business

This policy sets out how we handle whistleblowing concerns internally. In almost all cases, raising concerns with us first is the right approach - it gives us the opportunity to investigate and put things right before any external involvement becomes necessary.

In exceptional circumstances - for example, where you have genuine reason to believe a senior person is involved in a cover-up, or where internal reporting has not led to any action - you may need to go to an external body such as an industry regulator. Protect can advise you on which regulator is appropriate for the type of concern you want to raise.

This policy covers concerns about third parties - including suppliers, clients and service providers - as well as about our own employees. If your concern relates to a third party, please raise it with us first.

Going to the media - especially while an internal investigation is ongoing - is almost never justified or appropriate. We strongly discourage it. We will treat any contact with the media about a whistleblowing matter as a serious disciplinary issue, and it may result in dismissal, unless exceptional circumstances exist. We would expect you to have exhausted all internal and regulatory options, and to have taken full legal advice or advice from Protect, before approaching the media could be justified.

6. Bad faith disclosures

All concerns must be raised in good faith. The legal protections for whistleblowers do not extend to disclosures made maliciously or in the knowledge that they are untrue.

If we find that a concern has been raised dishonestly or with a malicious intent, we will treat this as a disciplinary matter under our Disciplinary Policy. It may result in dismissal for gross misconduct.

7. Training

This Policy is available to everyone it covers via the company's O Drive. An appropriate briefing will be provided to ensure they are fully aware of their rights and responsibilities under it.

8. Questions and administration

The HR Manager is responsible for administering this policy. If you have any questions, please speak to your line manager in the first instance or contact Sue Bailey on suebailey@ansteyhorne.co.uk and/or Stephen Walsh, COO on stevewalsh@ansteyhorne.co.uk.

Related policies: Grievance Policy - Disciplinary Policy - Harassment and Bullying Policy - Sexual Harassment Policy - Bribery Policy

Additional support: Health Assured - https://www.healthassured.org/wisdom-app/ - 0800 028 0199

External support: Protect - protect-advice.org.uk - 020 3117 2520

This policy does not form part of any contract of employment.