

Whistleblowing Policy

1. Introduction and Definitions

1.1

“Code”	means the Company Code of practice;
“Detriment”	means dismissal, victimisation, harassment, discrimination or disadvantage due to reporting a concern pursuant to this Policy;
“Policy”	means this Whistleblowing Policy;
“Supervisor”	means the supervisor, line manager or immediate manager of the Whistleblower;
“Whistleblower”	means any employee of the Company who does or potentially will, pursuant to this Policy, report any concern they have in relation to the Company’s practice; and
“Whistleblowing Policy”	means a clear and published internal procedure for staff and volunteers of fundraising organisations enabling them to report any concerns they may have regarding their organisation’s fundraising practice.

1.2 The Code

The Code outlines the legal rules that apply to fundraising and the standards designed to ensure that fundraising is open, honest and respectful.

1.3 This Policy and its purposes and aims

The Company is committed to being open, honest, and accountable, and encouraging a free and open culture in its dealing between the directors and the employees and stakeholders working in the Company.

It is in the public interest and in the interest of the Company that a Whistleblower should have a procedure for reporting concerns about its conduct. This Policy therefore sets out the Company’s policy and procedure as to how a Whistleblower may report such concerns.

1.4 Scope of the Act and this Policy

This Policy does not apply to a grievance – a grievance relates to a complainant’s own position or personal circumstances, whereas Whistleblowing relates not to the person making a report but instead to a general concern which has a public interest aspect to it.

1.5 **Confidential Information and ‘protected disclosures’**

Employees may, in properly carrying out their duties, have access to, or come into contact with, information of a confidential nature but, except in the proper performance of their duties, they must not disclose, or make use of in any form whatsoever, such confidential information.

Whistleblowing protection is a disclosure which, in the reasonable belief of the Whistleblower making the disclosure under this Policy, is made in the public interest.

This Policy provides that a disclosure is “protected” if it relates to a specific subject matter where the disclosure is made in an appropriate way, i.e. if made in accordance with this Policy.

2. **Specific Subject Matter**

If in the course of their duties, a Whistleblower becomes aware of information which they reasonably believe it is in the public interest to disclose and tends to show one or more of the following in relation to the Company:

- 2.1 a criminal offence (including fraud, theft or bribery) has been committed, is being committed or is likely to be committed;
- 2.2 a person has failed, is failing or is likely to fail to comply with any legal, professional or regulatory duty or obligation to which he is subject;
- 2.3 a person has failed, is failing or is likely to fail to protect children or vulnerable adults;
- 2.4 a miscarriage of justice has occurred, is occurring, or is likely to occur;
- 2.5 the health or safety of any individual has been, is being, or is likely to be, endangered;
- 2.6 the environment, has been, is being, or is likely to be, damaged;
- 2.7 there is or has been any financial malpractice or impropriety.

they should use the Company’s disclosure procedure as set out below.

3. **Disclosure Procedure**

- 3.1 If a Whistleblower reasonably believes that information tends to show one or more of the above, they should promptly disclose it to a Director of the Company. If it is inappropriate for the Whistleblower to make such a disclosure to their Supervisor (e.g. if the information to be disclosed relates to wrongdoing by their Supervisor or it is of an exceptionally serious nature), the Whistleblower should instead make the disclosure to the Chairman of the Company.
- 3.2 A Whistleblower should preferably make a disclosure in writing (including email) but may they instead do so by telephone or in person.
- 3.3 A Whistleblower does not have to provide evidence about their concern, but they will generally need to provide at least the following:
 - 3.4.1 the nature of their concern and why they believe it to be true; and
 - 3.4.2 the background and history of their concern (where possible).

4. The Investigation

- 4.1 Provided that a concern is reported by a Whistleblower in accordance with paragraphs 2 and 3 above, it will be without Detriment to them. Their identity, the concern, and the information disclosed by them, will thereafter be kept confidential by the Company so long as it does not hinder or frustrate initial enquiries, or any subsequent investigation carried out under this paragraph 4.
- 4.2 There will be an initial enquiry by the person to whom the concern is disclosed, to resolve the issue informally if possible. If that is not possible after the initial report of the concern, there will be a two-stage investigation process, as follows. No precise timescale can be laid down for how long the investigation will take.
- 4.3 Stage 1 after the report of a concern is made, the Company will confirm that the investigation will take place and will be in confidence and without Detriment to the Whistleblower, and the Supervisor or other person to whom the disclosure is made will investigate it with the Whistleblower and document the relevant facts relating to the concern; and
- Stage 2: On completion of the investigation, the person who has carried out the investigation will provide all information gathered in the investigation and will pass it to the Chairman of the Company so that they can consider the matter in full and decide on what if any further action should be taken in line with the Act and other relevant good practice and policies.
- 4.4 Where the investigation concludes that there has been some malpractice, further action may include disciplinary proceedings for one or more of the persons involved in it.
- 4.5 Where possible, the Company will inform the Whistleblower of all matters in relation to the investigation including any course of action decided.

5. Matters Relating to the use of the Procedure

- 5.1 Where a Whistleblower makes a disclosure, they do not have to prove the truth of the allegations they make when disclosing their concern. They may even be mistaken about it, but they must reasonably believe that the disclosure is made in the public interest and that the information they have tends to show some malpractice.
- 5.2 A Whistleblower will suffer no Detriment from the Company due to their making such a disclosure if they make their disclosure in accordance with this procedure but if they fail to follow this procedure, it may result in the disclosure of information losing its “protected status”.
- 5.3 The Company is committed to dealing with a concern raised by a Whistleblower pursuant to this Policy as quickly as possible, in an appropriate, fair and professional manner.
- 5.4 For further guidance in relation to use of the disclosure procedure, a Whistleblower should speak in confidence to the chairman of the Company.

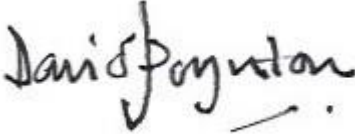
We confirm that this Policy has been approved and authorised by the Directors of the Company:

Name: David Poynton

Position: Chairman

Date: 26th May 2023

Signature:

A handwritten signature in black ink that reads "David Poynton". The signature is written in a cursive style with a horizontal line underneath the name.