

| | | | |
|--------------------------------|----------------------------------------------------------------------|--|--|
| 2 Whistleblowing Policy | | | |
| Date | December 2020 | | |
| Review | This policy will be reviewed periodically. | | |
| Contents | | | |
| 1 | Introduction | | |
| 2 | Background | | |
| 3 | Principles | | |
| 4 | Procedure | | |
| 5 | Form for an employee to make a protected disclosure (whistleblowing) | | |
| | | | |
| | | | |
| | | | |

1. INTRODUCTION

- 1.1 This policy applies to all employees of Sadeh. Other individuals performing functions in relation to the organisation, such as agency workers and contractors, are encouraged to use it.
- 1.2 It is important to the organisation that any fraud, misconduct or wrongdoing by workers of the organisation is reported and properly dealt with. The organisation therefore encourages all individuals to raise any concerns that they may have about the conduct of others in the organisation or the way in which the organisation is run. This policy sets out the way in which individuals may raise any concerns that they may have and how these concerns will be dealt with.

2. BACKGROUND

- 2.1 The law provides protection for workers who raise legitimate concerns about specified matters. These are called "qualifying disclosures". A qualifying disclosure is one made in the public interest by a worker who has a reasonable belief that:

- a criminal offence
- a miscarriage of justice
- an act creating risk to health and safety
- an act causing damage to the environment
- a breach of any other legal obligation, or
- concealment of any of the above,

is being, has been, or is likely to be, committed. It is not necessary for the worker to have proof that such an act is being, has been, or is likely to be, committed – a reasonable belief is enough. The worker has no responsibility for investigating the matter – it is Sadeh's responsibility to ensure that an investigation takes place.

- 2.2 A worker who makes a protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimised, because he/she has made a disclosure.
- 2.3 Sadeh encourages workers to raise their concerns under this procedure in the first instance.

3. PRINCIPLES

- Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Workers should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.
- Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the worker who raised the issue.

- No worker will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the worker will not be prejudiced because he/she has raised a legitimate concern.
- Victimisation of a worker for raising a qualified disclosure will be a disciplinary offence.
- If misconduct is discovered as a result of any investigation under this procedure the organisation's disciplinary procedure will be used, in addition to any appropriate external measures.
- Maliciously making a false allegation is a disciplinary offence.
- Any instruction to cover up a wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, workers should not agree to remain silent. They should report the matter to a director.

This procedure is for disclosures about matters other than a breach of an employee's own contract of employment. If an employee is concerned that his/her contract has been, or is likely to be, broken, he/she should use the organisation's grievance procedure.

4. **PROCEDURE**

- 4.1 In the first instance, and unless the worker reasonably believes his/her line manager to be involved in the wrongdoing, or if for any other reason the worker does not wish to approach his/her line manager, any concerns should be raised with the worker's line manager. If he/she believes the line manager to be involved, or for any reason does not wish to approach the line manager, then the worker should proceed straight to stage 3.
- 4.2 The line manager will arrange an investigation into the matter (either by investigating the matter him/herself or immediately passing the issue to someone in a more senior position, or a suitably competent and trusted third party). The investigation may involve the worker and other individuals involved giving a written statement. Any investigation will be carried out in accordance with the principles set out above. The worker's statement will be considered, and he/she will be asked to comment on any additional evidence obtained. The line manager (or the person who carried out the investigation) will then report to the Board, which will take any necessary action, including reporting the matter to any appropriate government department or regulatory agency. If disciplinary action is required, the disciplinary procedure will be started. On conclusion of any investigation, subject to the rights of others to confidentiality, the worker will be told the outcome of the investigation and what the Board has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained. The worker will not be told the outcome of any disciplinary proceedings against others, because such information is confidential to the individual in question.
- 4.3 If the worker is concerned that his/her line manager is involved in the wrongdoing, has failed to make a proper investigation or has failed to report the outcome of the investigations to the Board, he/she should inform a member of the Board, who will arrange for another suitable individual to review the investigation carried out, make any necessary enquiries and make his/her own report to the Board as in stage 2 above. If for any other reason the worker does not wish to approach his/her line manager, he/she should also in the first instance contact a Board member. Any such approach will be treated with the

strictest confidence and the worker's identity will not be disclosed without his/her prior consent.

4.4 If on conclusion of stages 1, 2 and 3 the worker reasonably believes that the appropriate action has not been taken, he/she should report the matter to the proper authority. The legislation sets out a number of bodies to which qualifying disclosures may be made. These include:

- HM Revenue & Customs
- the Financial Conduct Authority (formerly the Financial Services Authority)
- the Competition and Markets Authority
- the Health and Safety Executive
- the Environment Agency
- the Independent Police Complaints Commission, and
- the Serious Fraud Office.

5. **FORM FOR AN EMPLOYEE TO MAKE A PROTECTED DISCLOSURE (WHISTLEBLOWING)**

A worker may choose to use this form as a formal means to make a disclosure.

| Making a public interest disclosure (whistleblowing) | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| <p>This form is intended for use by any individual working for Sadeh (including contractors, agency workers and volunteers) who wishes to raise an issue about wrongdoing.</p> <p>This form should be used to report wrongdoing within the organisation (for example, financial irregularities or health and safety concerns), rather than to raise a personal grievance (for example, if you would like to make an allegation of bullying or harassment or are complaining that your contract of employment has been breached).</p> <p>If you are unsure about whether your concerns are best dealt with under the organisation's whistleblowing policy or grievance procedure, please read the whistleblowing policy, which provides examples of the issues that should be reported using this form. If having read the whistleblowing policy, you remain unsure about which procedure to use, please consult your line manager for further advice.</p> <p>Once you have submitted this form, the organisation's whistleblowing procedure will be invoked. This will result in an investigation, which will not involve anyone (for example, your line manager) you may have implicated below.</p> <p>In certain circumstances, you can request that your concerns be kept anonymous. Where possible, the organisation will respect a request for anonymity, but cannot guarantee that it will be able to do so.</p> <p>This form should be completed and delivered to the relevant person in an envelope marked "confidential" or sent as an e-mail attachment with "confidential" in the subject line.</p> | |
| Formal public interest disclosure (whistleblowing) | |
| Employee's name: | |
| Employee's job title: | |

| | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|
| Employee's department: | |
| Date: | |
| Does your public interest disclosure relate to your line manager? | Yes/No |
| Summary of disclosure: | |
| Please set out the details of the issue that you wish to raise, providing examples where possible, particularly dates, times, locations and the identities of those involved. You may attach additional sheets if required. | |
| Individuals involved: | |
| Please provide the names and contact details of any people involved in your concerns, including witnesses. | |
| Outcome requested: | |
| Please set out how you would like this issue to be dealt with, and why and how you believe that this will resolve the issue. | |
| Declaration: | |
| I confirm that the above statements are true to the best of my knowledge, information and belief. I understand that, if I knowingly make false allegations, this may result in the organisation taking disciplinary action against me. | |
| Form completed by: | |
| Signature: | |
| For completion by the organisation: | |
| Date received by the organisation: | |
| Name of recipient and job role: | |
| Signature: | |