

**COU-POL-016**  
**WHISTLEBLOWING POLICY**

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**1 Overview**

- 1.1 This policy outlines what you should do if you suspect something happening at work is putting you or others in danger or is illegal or unethical.
- 1.2 It applies to all employees, contractors, and other workers. It does not form part of your contract of employment and can be amended at any time.

**2 What is whistleblowing?**

- 2.1 Our aim is to maintain the highest standards of integrity in everything we do, but all organisations can occasionally be affected by conduct that is dangerous, against the law or breaches ethical or professional codes. Should you have such concerns, we encourage you to report them immediately - this is called 'whistleblowing'. You can be assured that your concerns will be taken seriously, they will be thoroughly investigated, and you can be confident that there will be no reprisals.
- 2.2 The types of concerns you may want to raise with us by whistleblowing include any: -
- activity you suspect is criminal
  - activity you suspect puts health and safety at risk
  - activity you suspect may damage the environment
  - activity you suspect is a miscarriage of justice
  - activity you suspect breaches our policy on bribery and corruption
  - failure to comply with legal or regulatory obligations
  - failure to meet professional requirements
  - attempt to conceal one or more of these activities
- 2.3 Speak to your manager or HR if you are not sure whether something you have become aware of is covered by this policy. Note that this policy does not cover anything to do with you personally, how other people are treating you, for example. For this, please refer to our policies on bullying and harassment and then to our grievance procedure for guidance on how to proceed.

**3 How to raise a whistleblowing concern**

- 3.1 In most cases, you should start by raising your concerns with your manager, either face-to-face or in writing.
- 3.2 If you would prefer not to go to your manager, or your manager fails to address all your concerns, you should write to HR. You should also do this if your concerns are of a very serious nature.
- 3.3 Your letter should say that you are raising your concerns under this policy and then explain what they are. Include all the key facts, dates, and the names of the people involved.

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**5 How we protect whistleblowers**

- 5.1 If you raise a concern in good faith under this policy, we will support you fully even if we find through our investigations that you made a mistake. However, if you feel you have been treated detrimentally as a result of raising a concern, you must tell us at once. First inform your manager and, if the matter remains unresolved, you must follow the formal process in our grievance procedure.
- 5.2 All whistleblowers are afforded the same protection, so you must not threaten others who have raised concerns. You may face disciplinary action if we find that you have.
- 5.3 You can seek further advice on whistleblowing, protecting confidentiality, and being protected from reprisals from the independent charity Public Concern at Work, which offers a confidential helpline on 020 7404 6609; [www.pcaw.org.uk](http://www.pcaw.org.uk).

**6 Taking your concerns outside the Company**

- 6.1 This policy outlines the process for raising, investigating, and resolving wrongdoing within the workplace. It is rarely necessary – or, from our point of view, desirable – for anyone outside the Company to become involved when a whistleblowing allegation is made.
- 6.2 In some exceptional circumstances, you may need to go to an external body – an industry regulator, for example – and the independent charity Public Concern at Work (contact details in paragraph 5.3) can direct you towards the appropriate regulator for the type of issue you want to raise.
- 6.3 This policy covers the actions of third parties such as suppliers, service providers, and clients, as well as our staff. Should you have concerns about a third party, you are encouraged to raise them with us before approaching anyone else. Your manager will be able to explain how you should proceed.



T Wilkinson  
Group Operations Director

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