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# WHISTLEBLOWING POLICY

Policy Owner – Corporate Legal Manager

## Document History

Issue	Date	Amendment Comment
Issue 1	01/03/2015	General Issue
Draft	01/10/2017	Amended, submitted for approval
Issue 2		General Issue
Issue 3	01/08/2019	Addition of Mysafeworkplace information

## Document Authorisation

Description	Name	Sign
Prepared By:	Mr M.Jefkins	
Reviewed By:	Mrs A Hodges	
Authorised By:	Mr A Bowden	

## **Policy aims and objectives**

The aim of this procedure is to encourage any employee to raise any genuine concerns they might have about certain wrongdoings within the Company without fear of reprisal, and to provide guidance on how to raise those concerns and to enable us to investigate such concerns and deal with them appropriately.

## **Eligibility**

This procedure applies to all employees, workers and anyone else who has a contract to carry out work for the Company personally. It does not apply to genuinely self-employed workers who run a profession or business on their own account.

## **Scope**

You should not use this procedure for complaints relating to your own circumstances, such as the way you have been treated at work. In those cases, you should use the Company Grievance Procedure. This procedure is for making a disclosure of wrongdoing or malpractice where you reasonably think that disclosure is in the public interest. If you are uncertain whether or not something is within the scope of this policy, you should seek advice from the HR department.

## **Types of wrongdoing addressed by this procedure**

If you genuinely believe that the Company, or any of our workers, has taken, is intending to take or has failed to take action that you reasonably believe could lead or amount to:

- a criminal offence including bribery;
- a failure to comply with any legal obligations;
- a miscarriage of justice;
- danger to the health and safety of any individual;
- damage to the environment, or
- the deliberate concealment of information concerning any of the matters listed above

You should disclose this information as soon as possible. If you make such a disclosure, you should provide full details and, where possible, supporting evidence.

## **Raising a concern**

Any concerns you have can be raised in confidence to your Line Manager.

If you are uncomfortable doing this, or the concern is in relation to your Line Manager then you can raise the concern verbally or in writing to the HR department.

If you do not feel comfortable using these reporting procedures you can raise a concern anonymously via an action line called MySafeWorkplace®. This enables any employee to submit an anonymous report regarding wrongdoing within J & E Hall via the internet ([www.mysafeworkplace.com](http://www.mysafeworkplace.com)) or by following the procedures on the site for making a report via telephone. This service is an enhancement, not a replacement, of our current policies and procedures.

Your confidential report will instantly and anonymously be forwarded to the appropriate individuals within J & E Hall. Upon submission, you will be provided with a confidential access number, as well as asked to generate a personal password, that enables you to anonymously re-enter the site at any time. You will then

be able to send and receive anonymous messages pertaining to your report and, if desired, participate in any follow-up. It is very important that you record your confidential access number and personal password, as they will be used to follow up on your report. You can call MySafeWorkplace® or log in to ([www.mysafeworkplace.com](http://www.mysafeworkplace.com)) to check report status at any time. Once the unique access code and password is entered, you may continue anonymous dialogue with us through the message board titled "Talk to Your Organization."

Any concerns covered by this procedure should be raised with the Company to allow us the chance to deal with them. You should not bypass this procedure and air concerns externally, other than in exceptional circumstances, for example if you have good reason to believe that evidence would be destroyed. Remember also that social media sites such as YouTube and Facebook are public rather than private spaces, and they are not the appropriate channel for raising concerns.

### **Investigating allegations of wrongdoing**

If you disclose information in accordance with this procedure, wherever reasonably practicable we will keep your identity confidential.

The Company will investigate your allegation promptly. During the course of our investigation we may require your assistance. We discourage anonymous disclosures as they are likely to hinder effective investigation. We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat information about the investigation as confidential. While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.

We will inform you of the outcome of the investigation as soon as practicable. We will take whatever action we consider to be appropriate.

### **Actions we may take**

No action will be taken against anyone who raises a genuine concern in accordance with this procedure. The Company may take appropriate action against any person found to be:

- victimising another person for using this procedure. Inform the HR department if you think you have been victimised, raise it formally under the Company Grievance Procedure;
- deterring any person from reporting genuine concerns under this procedure. Inform the HR department if you think you have been deterred and raise it formally under the Company Grievance Procedure.

For employees this action may involve the Company taking disciplinary action, which may result in dismissal.

The Company may also take disciplinary action against a person who does not act in accordance with this procedure.

### **Status of this procedure**

This policy does not give contractual rights to individual employees. The company reserves the right to alter any of its terms at any time although we will notify you of any changes.