

## Public Interest Disclosure Policy (Whistle Blowing Policy)

### Policy Overview

We encourage an open culture in all our dealings with employees, managers and all the people with whom we come into contact. Effective and honest communication is essential if malpractice is to be effectively dealt with. The procedure below provides guidelines to all our employees, casual, temporary agency staff, freelancers, trainees, home workers and contractors, who feel they need to raise certain issues, in confidence.

The *Public Interest Disclosure Act 1998* (commonly known as the 'Whistle Blowing Act') protects workers who raise legitimate concerns about specified matters from, being dismissed by the Company or being subjected to detrimental treatment or victimised by either the Company or colleagues as a result, provided certain criteria are met. Certain kinds of disclosures qualify for protection and these are set out below. These are disclosures of information which a worker reasonably believes are made in the public interest. They tend to show one or more of the following relevant failures is either happening now, took place in the past, or is likely to happen in the future:

- ▶ A criminal offence has been committed including offences such as theft, fraud or acts of bribery
- ▶ A person has failed, is failing, or is likely to fail to comply with a legal obligation which they are subject to
- ▶ A miscarriage of justice
- ▶ A danger to health and safety of any individual
- ▶ Damage to the environment
- ▶ Deliberate covering up of information tending to show any of the above five matters.
- ▶ Sexual harassment or sexual misconduct, including where this may amount to a breach of legal obligations or unlawful harassment under equality legislation.

The procedure is not a substitute for the Disciplinary and Grievance Policy and is not a channel for employees to raise matters in relation to their terms and conditions of employment. The procedure allows individuals to have their concerns treated in confidence.

### Your Protection

The Company will not subject any worker to detriment or dismissal for making a protected disclosure. Protection applies where a worker reasonably believes the disclosure is made in the public interest and tends to show wrongdoing as defined in law. Provided you have a reasonable belief that the information disclosed is true and in the public interest, it does not matter if your concern ultimately proves to be unfounded.

Legal protection depends on the disclosure meeting the statutory requirements under whistleblowing legislation.

The Company encourages concerns to be raised internally wherever possible, as this allows issues to be addressed promptly and effectively. However, a worker does not lose legal protection under whistleblowing legislation if they choose not to follow the internal reporting procedure.

### Your Confidence

The Company recognises that disclosures may be made anonymously. While anonymous concerns can be more difficult to investigate or respond to, they will not be automatically dismissed and will be considered in line with this policy.

Individuals are encouraged to provide contact details where possible, as this allows clarification of information and feedback on outcomes. However, anonymity will be respected where requested, subject to any legal or regulatory obligations.

Anonymous disclosures will be considered, and legal protection may still apply, though anonymity may limit the Company's ability to investigate fully or provide feedback.

## How to raise your concern

### **Stage 1: Internal Management**

If you have a concern about malpractice, we hope you will feel able to raise it first with your Manager or a more senior Manager. Concerns can be raised verbally or in writing. Written disclosures may assist investigation but are not required. It will help if you state the facts of the matter clearly. You can outline how you would like it to be investigated. If you have a direct or personal interest in the matter, you should also tell us at this stage.

### **Stage 2: Alternative Contacts**

If you feel unable to raise the matter with someone in your Line Management, for whatever reason, please speak to a director or HR Consultant who will support you to take the appropriate action.

If you want to raise the matter in confidence, we will ensure that practical measures are put in place to protect your identity. We will contact you by the most secure means. We will not disclose your identity without your agreement, unless we are required to do so by law.

Once you have reported your concern, the Company will investigate it to assess initially what action should be taken. If your concern falls more appropriately within other policies, we will tell you. An appropriate, impartial investigator will be appointed to carry out the investigation.

The disclosure will be treated seriously and promptly investigated and as part of the process the worker will be interviewed and asked to provide a written statement.

Once the Company has finalised the investigation any necessary action will be taken.

While the purpose of this policy is to enable us to investigate possible malpractice and take appropriate steps to deal with it, we will give you as much feedback as we properly can. If requested, we will confirm our response to you in writing. Please note, however, that we may not be able to tell you the precise action we take where this would infringe a duty of confidentiality owed by us to someone else.

## Support and Advice

During the investigation process, the Company will ensure that you have access to appropriate support. This may include access to legal advice, a confidential helpline, or external support services. We encourage you to reach out if you feel the need for support throughout the process.

## If you are dissatisfied

If you are dissatisfied with the Company's response, or if you reasonably believe that it is not appropriate to raise the matter internally, you may report your concern to a prescribed person or regulator. Prescribed persons include bodies such as the Health and Safety Executive, the Information Commissioner's Office, the Equality and Human Rights Commission, and other regulators specified by law. A worker may still be legally protected even if they choose not to raise a concern internally first, provided the disclosure meets the statutory requirements. Wider disclosures, for example to the media, are protected only in limited circumstances and where specific legal conditions are met.

## Deliberately False Allegations

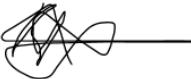
The Company encourages workers to raise genuine concerns in good faith. If a concern is raised honestly and with a reasonable belief in its truth, no action will be taken even if it is not upheld. However, making a disclosure that is knowingly false or made in bad faith may be treated as a disciplinary matter.

## Record Keeping

All whistleblowing concerns and investigations will be recorded in accordance with **the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018**, to ensure that confidentiality is maintained. All records will be retained for an appropriate period, in line with the Company's data retention policy.

## Policy Review

This policy will be reviewed annually or earlier if deemed necessary.

Signed and Approved By	Charlotte Goodwill
Job Title	Chief Executive Officer
Signature	
Date Signed	22/01/2026

## Document Management

**Owner:** Hanna Bland – Finance and Operations

**Last Review Date:** 22/01/2026

**Next Review Date:** 22/01/2027

## Version Control

Version	Date	Change
Version 01	05/09/2022	New document
Version 02	05/09/2023	Addition of paragraph pertaining to Record Keeping
Version 03	05/09/2024	Addition of paragraph pertaining to Support and Advice
Version 04	22/01/2026	Policy updated to reflect current whistleblowing legislation and best practice. Few Minor Amendments to wording. Addition of 'Deliberately False Allegations'.