

# Whistleblowing Policy.

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Net Consulting is committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.

This policy covers all employees, officers, consultants, contractors, volunteers, work experience interns, casual workers and agency workers.

## Definition

Whistleblowing is when an individual knows, or suspects, that there is some wrongdoing occurring within the organisation and alerts the employer or the relevant authority accordingly.

Although this list is not exhaustive, examples of situations in which it might be appropriate for an individual to report a wrongdoing include:

- a breach, or potential breach, of health and safety legislation
- financial irregularities
- harassment of a colleague, customer or other individual
- damage to the environment
- the committing of a criminal offence
- an act of bribery
- fraud
- any breach of legal or professional obligations
- deliberate concealment of any of the above

## Actions to Be Taken By the Individual

If you know or suspect that some wrongdoing is occurring within the organisation, you should raise the matter immediately with your line manager. However, where you prefer not to raise it with your line manager for any reason, you should contact a director.

The organisation will arrange a meeting with you as soon as possible to discuss your concern.

## Action to Be Taken by the Manager

Any manager who is informed by an individual of potential wrongdoing will take immediate action to investigate the situation.

When you raise an issue, you will be kept informed of any investigation that is taking place. You will also be informed of the outcome of the investigation. It might not always be appropriate to tell you the detail of any action that is taken, but you will be informed if action is taken.

## **Data protection and Confidentiality**

We hope that staff will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. When you make a disclosure, we will process any personal data collected in accordance with our Data Protection Policy. Data collected from the point at which you make the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure. If you want to raise a concern confidentially, the organisation will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating the concern.

## **Alerting Outside Bodies to a Potential Wrongdoing**

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

You should always, in the first instance, talk to a manager in the organisation about a potential wrongdoing.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external. You should:

- have a reasonable belief that the allegation is based on correct facts
- make the disclosure to a relevant body
- have a reasonable belief it is in the public interest to make the disclosure

A “relevant body” is likely to be a regulatory body (e.g. the Health and Safety Executive, or the Financial Services Authority).

Public Concern at Work operates a confidential helpline. Their contact details are at the end of this policy.

## **Contacting the Media**

The media is not a relevant external body. You should not contact the media with allegations about the organisation, except in extraordinary circumstances where neither the organisation nor the relevant regulatory body would be appropriate.

## **Protection Against Detriment**

The organisation aims to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Any individual who acts under the Public Interest Disclosure Act 1998 will be protected from suffering any detriment in relation to the allegations that are made, including victimisation by the organisation or by colleagues.

If you do not follow the procedure set out, which encompasses the requirements of the Public Disclosure Act 1998, the protection against detriment will not apply. Disclosing information in an inappropriate way (e.g. contacting the media) or making false allegations maliciously or with a view to personal gain could result in disciplinary action being taken against you, which could include dismissal.

Individuals must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct, you may be subject to disciplinary action. If you believe that you have suffered any detrimental treatment, you should raise it using our Grievance Procedure.

Protect  (Independent whistleblowing charity)	Helpline: 020 3117 2520
	E-mail: <a href="mailto:whistle@protect-advice.org.uk">whistle@protect-advice.org.uk</a>
	Website: <a href="https://protect-advice.org.uk/">https://protect-advice.org.uk/</a>

**This policy is not contractual and may be varied by the organisation at any time.**