WHISTLEBLOWING POLICY

1. About this policy

1.1. We are committed to conducting our work with honesty and integrity and expect all staff to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

1.2. The aims of this policy are:

1.2.1. To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.

1.2.2. To provide staff with guidance as to how to raise those concerns.

1.2.3. To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

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

1.4. This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. What is Whistleblowing?

2.1. Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

2.1.1. criminal activity;

2.1.2. failure to comply with any legal, professional obligation or regulatory requirements;

2.1.3. miscarriages of justice;

2.1.4. danger to health and safety;

2.1.5. damage to the environment;

2.1.6. bribery

2.1.7. facilitating tax evasion

2.1.8. financial fraud or mismanagement;

2.1.9. breach of our internal policies and procedures;

2.1.10. conduct likely to damage our reputation or financial wellbeing;

2.1.11. unauthorised disclosure of confidential information;

2.1.12. negligence;

2.1.13. the deliberate concealment of any of the above matters.

2.2. A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy.

2.3. This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Procedure or Dignity at Work Policy.

3. Raising a Whistleblowing Concern

3.1. We hope that in many cases you will be able to raise any concerns with your line manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively.

3.2. However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact a member of the senior management team.

3.3. We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

3.4. We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

4. Confidentiality

4.1. We hope that staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

4.2. We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. If you are in any doubt you can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

5. Investigation and Outcome

5.1. Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

5.2. In some cases we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

5.3. 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 any information about the investigation as confidential.

6. Protection for those making complaints or assisting with an investigation

6.1. Employees who make complaints or who participate in good faith in any investigation conducted under this policy will be protected from any form of intimidation or victimisation as a result of their involvement.

6.2. Any employee who is, after investigation, found to have deliberately provided false information or to have acted in bad faith may be subject to action under the Disciplinary Procedure.

7. If you are not satisfied

7.1. 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.

7.2. If you are not happy with the way in which your concern has been handled, you can raise it with a more member of the senior management team.

8. External Disclosures

8.1. 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.

8.2. 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. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

8.3. Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a customer/client, supplier or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first. You should contact your line manager or one of the other individuals set out in Paragraph 3 for guidance.

9. Protection and Support for Whistleblowers

9.1. It is understandable that Whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

9.2. Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform a senior manager immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

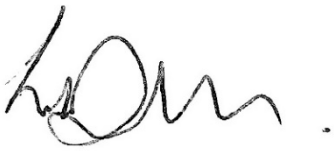
9.3. You must not threaten or retaliate against Whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action.

10. Personnel Responsible for this Policy

10.1. This policy applies to all levels within the Organisation regardless seniority or status.

Protect **(Independent whistleblowing charity)**	**Helpline: 020 3117 2520** **Website: https://protect-advice.org.uk** **a contact form is available on the website**

Signed



Dr Lawrence Mockett BSc PhD PGDip FGS

Joint Managing Director

Southern Testing Laboratories

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