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Just Dynamic Recruitment

Whistleblowing Policy

THE POLICY

Most employees at some time have concerns about matters in work which are usually easily resolved. However, where an employee has concerns about serious malpractice such as fraud; financial irregularities; corruption; bribery; dishonesty; or creating or ignoring a serious risk to health and safety then it is important that the employee is able to raise such concerns without fear of reprisal.

The Public Interest Disclosure Act 1998 allows individuals to disclose certain issues to particular external parties where there is good reason to believe that internal disclosure will not be taken seriously or will cause the individual making the disclosure to be penalised in some way. However, the company is committed to dealing responsibly, openly and professionally with any genuine concern and encourages employees to discuss concerns internally wherever possible.

The aim of this policy is to ensure that employees are fully aware of the sorts of matters which they should report, and the reporting procedure employees should follow.

THE POLICY IN OPERATION

This policy applies to all staff. This includes staff directly employed, staff on secondment from other organisations, and other temporary staff. The aim of this policy is to ensure that employees are fully aware of the sorts of matters which they should report and the reporting procedure they should follow.

The procedures outlined below enable an employee to come forward in confidence with their concerns without fear of being punished for doing so and to have those concerns thoroughly investigated. Once an investigation has taken place, a decision will be made as to what action, if any, should be taken to address the problems.

It is the responsibility of everyone to ensure that appropriate, reasonable and timely action is taken in relation to any concerns of wrongdoing or malpractice raised that could expose the company to loss or liability. Employees are encouraged to report any situation or matter which, they reasonably believe, might show that one or more of the following has occurred, is occurring or is likely to occur in the future:

- a criminal offence;
- a failure to comply with a legal obligation;
- a miscarriage of justice;
- a danger to the health and safety of any individual;
- a damage to the environment;
- a deliberate cover-up of any of the above matters;
- a serious act of misconduct;
- a serious breach of the Company's conduct rules

This reporting procedure should also be followed if employees feel that they have been asked to do something which they believe to be improper or unethical or would result in them being implicated in any of the matters listed above.

HOW TO RAISE A CONCERN INTERNALLY

As soon as an employee becomes aware of any matter of the type listed above, or if the employee wishes to confirm whether it is a matter which should be raised, he or she should speak informally with his or her line manager.

If the employee decides to raise the matter under the policy, he or she should then report it immediately to their line manager. If the employee wishes to raise the matter outside of the direct line manager, he or she should report it to the internal Confidential Helpline on **0800 915 1571**

It is very important for employees to report promptly any of the matters referred to above in order to assist the company to uphold its high standards and to help prevent the concealment or destruction of evidence which might need to be reviewed.

The company will look into the matter and make an initial assessment of what action should be taken. This might involve an internal inquiry or a more formal investigation. The employee will be told who is handling the matter, how he or she can contact them and whether further assistance may be needed. Subject to any legal constraint, the employee will be kept informed of the progress of the investigation and its outcome. The employee will have an assurance that the matter will be dealt with promptly and within a reasonable time.

HOW TO RAISE A CONCERN EXTERNALLY

It should only be in exceptional circumstances that it should be necessary for an employee to raise a concern externally. It is accepted however that an employee may disclose information to a legal adviser in the course of obtaining legal advice. Provided the disclosure is made in good faith and the employee believes it to be substantially true, he or she may also disclose information to one of a number of prescribed "supervisory persons" that protected disclosures may be made to under the Act – such as the Health & Safety Executive for health & safety matters.

Employees should seek independent advice before raising concerns externally so that they can be advised on whether the proposed disclosure may be protected under the Act. Such advice can be obtained from the charity public concern at work. Further information can be found by looking at the website: www.safecall.co.uk. Employees can be assured that no one who reports any concern under this policy in good faith will suffer any detriment for coming forward, regardless of whether or not the concern is ultimately substantiated. Victimising staff for or deterring them from raising a concern under this policy is a disciplinary offence and will be dealt with under the disciplinary procedures.

The Company encourages disclosures made in good faith. However, employees should be aware that disclosure to the media or to non-prescribed persons will not usually be protected unless there are extreme circumstances and that non-protected disclosures may lead to disciplinary action being taken.

HOW THE COMPANY WILL HANDLE ALLEGED DETRIMENT

If an employee believes that he or she is being victimised by or suffering any detriment from someone from within the company as a result of reporting a concern or assisting in any investigation, he or she must inform the employee's line manager immediately and appropriate action will be taken to protect the employee.

Disciplinary Action

Disciplinary action will be taken against anyone who:

- Deliberately makes false or malicious allegations;
 - Makes disclosures for personal gain;
 - Makes a non-protected disclosure without exhausting the internal procedure;
 - Victimises anyone for raising a concern or making a disclosure under this policy;
 - Inappropriately deters anyone from making a legitimate disclosure.
- Such conduct will be treated as gross misconduct and may lead to dismissal.

Where, following investigation, a disclosure is substantiated, disciplinary action, or other appropriate sanction, may be taken against the person who is the subject of the disclosure.

GUIDANCE ON SPECIFIC ISSUES

This policy is designed to allow a channel for serious issues of a public interest (i.e. inappropriate or illegal use of public resources) to be raised. It should not be used for concerns of any other nature which employees feel have a particular negative impact on them and for which the normal grievance or other appropriate procedure should be used.

Version	Date	Author	Description of Changes	Approved By
V.01	06/01/2025	MR	Initial version of Whistleblowing Policy	KB
V.02	06/01/2026	EI	Updated version of Whistleblowing Policy	KB