

WHISTLEBLOWING POLICY

APPROVAL CONTROL

ROLE	NAME	DATE
Chief of Staff	Sara Robinson	30/07/2018

VERSION CONTROL

VERSION	AUTHOR NAME	VERSION CHANGES	DATE
5.1	Gail Lawrence	New template	1.6.2016
5.2	Jayne Morris	Update to policy to reflect independent whistleblowing service	29/06/2017
6.0	Sara Robinson	Signed off	03/07/2017
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OBJECTIVE

This policy communicates our Whistleblowing Procedures and how a Representative can make a disclosure under the Public Disclosure Act 1998.

APPLICABILITY

This Policy applies to all permanent, temporary, contractors and fixed term contract employees of Huntswood ("Huntswood representatives").

GENERAL STATEMENT

Huntswood encourages a free and open culture in its dealings and all people with whom it engages in business and legal relations. In particular, we recognise that effective and honest communication is essential to our success.

We recognise the particular difficulties which those who work for us may face if they feel the need to disclose to us instances of malpractice in the conduct of our business ("blow the whistle"). As a result, Huntswood has engaged an independent organisation, Expolink, to make it easier for you to speak up.

We are committed to ensuring that any such malpractice is immediately dealt with should it arise and future recurrence prevented. This procedure has been established to enable anyone working for us, who genuinely believes that malpractice is occurring, has occurred, or is likely to occur within Huntswood, to raise the matter with the appropriate level of management in confidence and without fear of recrimination.

All Representatives are reminded that the unauthorised disclosure to third parties of confidential information belonging to Huntswood or relating to its business will constitute a breach of contract which may lead to summary dismissal or the summary termination of any contract for services and may in addition; give rise to legal action for the recovery of damages. There are a limited number of reasons that disclosure to a third party is authorised and these are explained further on.

Should you be working on one of our client engagements and your concern relates to one of our clients, the client's Whistleblowing Policy should be followed.

SUBJECT MATTER OF DISCLOSURES

Under this procedure you are encouraged to disclose to Huntswood any matter concerning the conduct of our business which leads you to believe that malpractice is occurring, may occur or has occurred. In particular, you are encouraged to disclose the occurrence or likely occurrence of any of the following:

- a) commission of a criminal offence;
- b) failure to comply with a legal obligation or regulatory requirement applicable to Huntswood's business;
- c) endangerment of health and safety;

- d) damage to the environment;
- e) bribery or corruption by employees or associated persons of Huntswood
- f) breach of any of Huntswood's intellectual property rights; or
- g) concealment of information which reveals any of the above matters.

PROCEDURE

1. Reporting your concern

You should raise your concerns initially with the person who has immediate responsibility for your work ("your Line Manager"). If the reporting malpractice that you wish to report concerns the Line Manager, or you consider that it is not appropriate that you disclose your information directly to the Line Manager for any reason, you may make your initial disclosure to another person in a senior position within the Company. Alternatively, a report can be made using the independent organisation, Expolink, engaged to manage whistleblowing on behalf of Huntswood. A report can be made to them in the following ways:

- By telephone using the Freephone number: 0800 374 199
- Through their website: wrs.expolink.co.uk/Huntswood
- Through their app: SpeakingUp, access code: Huntswood

Expolink will:

- issue you with a unique reference that allows you to:
 - get back in touch with them
 - update your report
 - respond to information requests from Huntswood – even if you have reported anonymously
- pass the details of your report to Huntswood for investigation

The Head of Human Resources has overall responsibility for the operation of our whistleblowing procedure.

2. Confidentiality

Any disclosure made under this procedure will be treated in strictest confidence by the person to whom it is reported and the origin of any allegation will be kept confidential wherever possible. You may, if you wish, make a disclosure under the procedure anonymously, in writing, to the appropriate person outlined above. However, our ability to investigate any disclosure may be hampered when the source of the information chooses to remain anonymous.

3. Keeping you up to date

We will normally contact you within 7 days to confirm that the disclosure has been received and if possible, indicate how we propose to deal with the matter and provide a likely timetable of how the matter will be dealt with. If this is not possible within 7 days, it will be done as soon as reasonably practicable. If you have reported your concerns using Expolink, updates will be provided through your unique reference on their website, particularly if you have chosen to remain anonymous.

4. Investigation

We will make an appropriate investigation of the matter that you have disclosed. You may be requested to put your concerns in writing or to attend as a witness during any stage of the investigation. If you are requested to attend, you will be permitted to be accompanied by an appropriate colleague or union representative if you wish.

We will carry out an investigation and implement any necessary action as soon as is reasonably practicable. Where possible, we will inform you of the outcome of the investigation and any action which is proposed to be taken to rectify any established malpractice. We will aim to do this, where possible, within 14 days of the conclusion of the investigation. If we cannot provide a response within this time you will be informed of the likely timetable.

5. Raising a concern externally

The purpose of this policy is to give you the opportunity and protection you need to raise your concerns internally without reporting the concern to external bodies.

It is, therefore, expected that raising concerns internally will be the most appropriate action to be taken in almost all cases and so you must try to do so. If, however, you feel you cannot raise your concerns internally you may consider raising your concerns externally.

In such circumstances you should raise your concern with the appropriate regulator e.g. Health and Safety Executive, Environmental Health Department, FCA etc.

OUR APPROACH

Any queries you may have concerning this Policy should be directed to the Head of Human Resources.

Employees will be not punished or subject to any detriment or reprisal by reason of having made a disclosure in accordance with this procedure in good faith. Any harassment, victimisation or less favourable treatment of any person on such grounds will be treated as a disciplinary offence and may lead to summary dismissal.

Any disclosure which is made under this procedure in bad faith (for instance, in order to cause disruption within Huntswood), which concerns information which you do not believe to be true or which is motivated for personal gain will be treated as a disciplinary offence and may lead to summary dismissal.

TABLE OF DEFINITIONS

The table of definitions provides definitions of terms used within the policy document

TERM	DEFINITION
Huntswood Representative	Permanent, temporary, contractors and fixed term contract employees of Huntswood

POLICY RESPONSIBILITIES

The following table defines the business roles and their responsibilities in regard of the policy document.

RESPONSIBILITY	ROLE	DEFINITION
Owner	Head of HR	The Owner ensures the policy is reviewed and maintained on a regular basis
Reviewer	Chief of Staff	The Reviewer ensures the policy document aligns with relevant legislation and company requirements
Author	Head of HR	Shall update the policy document in a succinct time frame on receiving updates from the reviewer and in accordance with company policy writing guidelines
Policy Audience	Huntswood Representative	Must apply the business policy to the business they undertake on behalf of Huntswood

APPLICABLE STANDARDS AND LEGISLATION

- Employment Rights Act 1996
- Public Interest Disclosure Act 1998