Coniston

Whistleblowing Policy

Definition

Whistleblowing is the name given to the act of the disclosure of information to the employer or the relevant authority by an individual who knows, or suspects, that the Company is responsible for or taken part in some wrongdoing.

Those making qualifying disclosures are protected against dismissal or detriment by The Public Interest Disclosure Act 1998.

Qualifying disclosures

Certain disclosures are prescribed by law as “qualifying disclosures”. A “qualifying disclosure” means a disclosure of information that the employee genuinely and reasonably believes is in the public interest and shows that the Company has committed a “relevant failure” by:

- committing a criminal offence
- failing to comply with a legal obligation
- a miscarriage of justice
- endangering the health and safety of an individual
- sexual harassment (unwanted conduct of a sexual nature, as defined in the Equality Act 2010)
- environmental damage or
- concealing any information relating to the above.

These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. The Company will take any concerns raised that relate to the above matters very seriously.

Employees must reasonably believe that the disclosure is “in the public interest”. The company encourages employees to use the procedure to raise any such concerns.

Should the concern not meet the requirement to be a qualifying disclosure, it should be raised under the Company’s grievance policy. Where a concern is raised under the whistleblowing policy where it is not appropriate to do so, i.e. it relates to a personal grievance, the receiving manager will confirm that the matter will be addressed under the grievance policy.

The procedure

In the first instance employees should report their concerns to their line manager. Where the concern relates to their line manager, or it is not appropriate to make the report to their line manager, the concern should be directed to the HR Manager. All concerns reported will be treated in the utmost confidence. Employees may be asked to confirm any verbal concerns in writing or to confirm a written record of a verbal report.

Following receipt of a disclosure made under this policy, an investigation meeting will be held with the employee. The purpose of this meeting is to gather as much information as possible from the employee regarding their concerns, including whether they have any supporting evidence or can identify any witnesses. This meeting will be held within 10 working days following receipt of the disclosure.

After this meeting, the investigating manager will commence a full investigation into the concerns raised. The investigation will aim to gather all relevant information including relevant documentary evidence or witness statements. This investigation must be completed within 10 working days following receipt of the disclosure. If this is not possible, the investigating manager will speak to the employee in advance of the completion deadline to agree an extended period of investigation.

Once the investigation is complete, the investigating manager will write to the employee confirming the outcome.

If the employee is not satisfied with the explanation or outcome, they may raise the matter with the appropriate official organisation or regulatory body. Alternatively, employees may raise a formal complaint under the Company's grievance policy.

Formal action

Should formal action be required as a result of any disclosure made under this policy, this action will be carried out in accordance with the applicable internal policy. Any potential sanctions imposed will be fair and reasonable in line with the relevant policy.

Protection against detrimental treatment

All employees who raise matters of concern under this policy are protected against detrimental treatment, up to and including dismissal, because they have made a disclosure.

Bullying, harassment or any other detrimental treatment afforded to a colleague who has made a qualifying disclosure is unacceptable. Anyone found to have acted in such a manner will be subject to disciplinary action, in line with company policy.

This policy will be reviewed at least annually or at other intervals deemed appropriate by statutory changes Any alterations to this policy will be recorded below.

Revision	Date	Owner	Changes Made
0.1	01/10/2022	Ravinder Clair	Draft
1.0	01/10/2022	Ravinder Clair	Approved and published
1.0	01/10/2023	Ravinder Clair	Reviewed – no changes
1.0	01/10/2024	Ravinder Clair	Reviewed – no changes
1.0	01/10/2025	Ravinder Clair	Reviewed – no changes
2.0	19/06/2026	Ravinder Clair	Updated to reflect ERA 2025 changes