Whistleblowing Policy

Stanmore Quality Services Ltd (SQS), the Company is committed to maintaining the highest standards of quality, accountability and openness and to ensure that any malpractice, should it arise, is immediately dealt with and seeks to assure members of staff, with concerns about serious malpractice, that it is safe to raise them without fear of reprisal. This policy encompasses the spirit of the Public Interest Disclosure Act 1998, and the policy intends to protect members of staff, who disclose conduct or neglect of duty, by other members of staff, which is criminal, dangerous or otherwise improper.

Definition of a Qualifying Disclosure

Under the Act a qualifying disclosure is defined as: "...any disclosure of information which, in the reasonable belief of the member of staff making the disclosure, tends to show one or other of the following matters'':

- The commission of a criminal offence i.e. fraud, theft etc.
- A breach or likely breach to comply with a legal obligation
- A miscarriage of justice
- A danger to the health and safety of any individual
- Damage to the environment
- Deliberate concealment of any of the above

In considering whether to use this policy and procedure employees need to exercise careful judgement and should satisfy themselves that the suspected failing is serious and that the potential disadvantage or damage is significant.

Any overenthusiastic reporting would be considered inappropriate and counter-productive and may lead to investigation and subsequent disciplinary action.

- The term 'whistleblower' is used to describe staff making such a disclosure
- This policy is not intended to replace the Grievance Procedure, which should be used if members of staff are concerned about themselves being personally disadvantaged by any action or failure of action by the Company

Employee's Responsibility

All employees have a duty to raise any concerns about serious malpractice they become aware of and are encouraged to 'blow the whistle' as early as possible, by using internal processes initially, so that these issues may be investigated without delay.

Protection

Members of staff (including temporary employee, contractors + agency workers) disclosing information will be 'protected' if:

- The disclosure is made in good faith
- They have a genuine belief that it is true
- It is not made for personal gain or malicious intent
- The information meets the criteria of a 'qualifying disclosure'

The Company will ensure that a 'whistleblower' will not be subjected to a detriment, disciplinary action or dismissal, on account of having made a protected disclosure, if made in good faith and in accordance with this policy and procedure.

- Protection will apply equally if a member of staff comes forward in good faith but, after investigation, their concerns turn out to be unjustified
- Anyone who tries to discourage a member of staff from coming forward to voice a concern will be subject to investigation under the Disciplinary Procedure
- If any reports of victimisation, harassment, bullying etc. against a 'whistleblower' are made, the individual(s) concerned will be investigated under the Disciplinary Procedure

Procedure

In following this procedure members of staff have the right to be accompanied by a fellow employee.

Internal Reporting Procedure (to be used in the majority of cases)

It will usually be appropriate for most staff concerns or complaints to be dealt with by their line manager or other appointed manager, initially through the normal Grievance Procedure. If at this stage no satisfactory conclusion is reached, the matter can then be raised as a disclosure under this policy.

In those cases where members of staff may feel unable to approach their line manager, senior manager or a director, the following confidential, internal reporting channels are available without fear of reprisal or victimisation:

- the HR Department, by telephone call, email or letter
- the confidential 'whistleblowing' helpline (Speak up Line 020 8166 9210 option 1 for HR and then option 2).

Where the confidential helpline is used the call will go through to a telephone number, the telephone call will not be answered, it will go straight to answerphone.

The confidential helpline will be checked by any one of the HR team daily and any messages received will be passed on to the People Director or Executive Director who will manage the information appropriately.

For anonymous messages, the answer phone message will be deleted, to support the anonymous process, in these circumstances any telephone numbers will not be noted and will not be used in any reports.

If there is a need for an independent investigation that needs to take place outside of the company, SQS will engage with an independent body e.g., an HR Consultant to carry this out.

Receiving a Complaint

In receiving a complaint, the HR department will use the utmost discretion and judgement in deciding how the matter should be pursued and may have to refer the matter to another appropriate internal person/source for guidance.

Depending upon the nature and seriousness of the complaint, external bodies such as the police or external auditors may have to be involved.

External Reporting Procedure (only to be used in extreme cases)

If the Company's policies and procedures are working effectively, it should not be necessary to contact any external bodies, apart from exceptional cases of extreme urgency or seriousness.

If the 'whistleblower' raises their concerns with an external body without first exhausting the internal procedure, they will only be 'protected' if in making the disclosure externally they:

- Fear they will be subjected to a detriment if they raise the matter internally
- Believe the Company may conceal or destroy evidence if the disclosure is made internally first
- Have previously made the disclosure internally but no action has been taken
- Consider the seriousness of the allegation warranted such action

Investigation

If an employee comes forward with a concern, it will be carefully and thoroughly investigated in accordance with the procedure. In its investigations, the Company will take into consideration any concerns the employee has about their own safety, welfare etc. Appropriate and agreeable solutions will be sought.

The Company will be fair to the 'whistleblower' but, in accordance with the principles of natural justice, also has a duty to be fair to any others involved in the investigation process and to those against whom the complaints or allegations are made. All persons involved in the investigation process will have the right to be accompanied by another employee.

Confidentiality

If confidentiality is requested by the 'whistleblower', or others involved in the investigation process, the Company will endeavour to honour such requests. In cases where anonymity could hinder investigations confidentiality cannot be guaranteed, but all efforts will be made to ensure that the 'whistleblower's wellbeing does not suffer as a result.

Results

The Company will seek to keep the 'whistleblower' informed of the investigation processes, proceedings, and eventual outcomes.
If the 'whistleblower' is dissatisfied with the outcome, they should initially raise the matter with a more senior person.

Monitoring

Any concerns, reported either internally or externally, will be confidentially monitored by the Executive Directors/Human Resources Department.

Abuse of the Policy & Procedure

This policy is not intended for malicious use, anyone found to be knowingly raising unfounded allegations or using the policy to raise matters of a trivial nature will be liable to investigation under the Disciplinary Procedure.

Promoting Good Practice Guidelines

- Lead by example, no-one is perfect, but it is hard to criticise others if your own practice is not up to standard
- Ensure that you understand the Company's policies and procedures and what is expected of you
- If a colleague does something that seems strange, question it with tact and diplomacy
- Do not wait until something becomes a major problem – raise as soon as possible.