



Whistleblowing

The Scheme expects the highest standard of conduct from all members of our team and will treat any concern that a team member may have about illegal or improper conduct. Where an individual discovers information which they believe shows serious malpractice, wrongdoing or neglect within the Scheme then this information should be disclosed internally without fear of reprisal. Officially this is called 'making a disclosure in the public interest'.

We recognise that incidents of wrongdoing in the workplace are unacceptable and is therefore committed to ensuring that any such malpractice is prevented and immediately dealt with if it should arise.

Team members are often the first to realise that there may be something wrong within the Scheme, however, may not express concerns because of feelings that speaking up would be disloyal to colleagues or to the organisation. They may also fear harassment or victimisation. In these circumstances it may be easier to ignore the concern rather than report what may be just a suspicion of malpractice.

We encourage our team to raise genuine concerns about wrongdoing at the earliest practicable stage rather than wait for proof. Wrongdoing within the organisation is taken very seriously.

This procedure is to provide safeguards to enable all team members to raise concerns about wrongdoing in connection with the Scheme. The aim is to provide a rapid mechanism under which genuine concerns made in good faith can be raised internally without fear of repercussions to the individual.

- The Scheme believes that good communications amongst the team promotes better business practice.
- The Scheme will not tolerate wrongdoing by members of the team at any level.
- If you have a serious concern relating to one of the areas listed below the matter can be reported, in the manner set out in this procedure, without fear of reprisals.
- The purpose of this procedure is to enable the Scheme to investigate and deal properly and sensitively with allegations of wrongdoing raised by team members.
- You should use this procedure if you wish to report or raise concerns about wrongdoing of the nature listed below. It is not intended to replace the grievance procedure, which continues to be the appropriate way to raise personal issues relating to your job or employment.

Procedure

If you genuinely believe that the Scheme or any employee of the Scheme has taken, is intending or has failed to take action that is reasonably believed, will lead or amount to:

- A criminal offence;
- A failure to comply with any legal obligations;
- A miscarriage of justice;
- Danger to the health and safety of any individual;
- Damage to the environment; or
- the deliberate concealment of information tending to show any of the matters listed above.

You should disclose this information in confidence to the Scheme Manager, or if it is about the Manager, to the Nominated Officer, if the complaint involves the nominated officer then the Chairperson should be informed. If such a disclosure is made, full details should be provided and, where possible, supporting evidence. It is important that these types of issues are dealt with sensitively and quickly. Anonymous disclosures are allowed but are strongly discouraged as they are likely to hinder effective investigation. If you disclose information in accordance with this procedure, in so far as it is reasonably practicable, your identity will be kept confidential.

The nominated officer is the Scheme Secretary.

Following receipt of whistleblowing report:

- a) We will promptly investigate any allegation and will take whatever action it considers appropriate. Assistance may be required during the investigation from the team member making the allegation, where assistance is required it will be done sensitively and confidentially. The allegation will be addressed seriously and the team member making the allegation will be informed of the outcome of the investigation as soon as practicable.
- b) If it is reasonably believed by the team member making the complaint that the nature of the concern relates to any of the areas set out above and the information is disclosed to the appropriate person under this procedure in good faith, no action will be taken against them for making the disclosure.
- c) The Scheme will take appropriate action against any person:
 - Found to be victimising another person for using this procedure, or deterring any person from reporting genuine concerns under it; or
 - Making the disclosure/allegation maliciously, or where there were no reasonable grounds for believing that the information supplied was accurate.
 - For those people employed directly by the Scheme, disciplinary action may be taken, which may result in dismissal.