

Last updated by: Charlotte Fisher

On: 15th January 2022

Policy renewed at least annually, or as required according to changes in procedures or legislation. The policy is available on the Europa website.

Responsibility for this Document: Charlotte Fisher

Responsibility for implementation: Charlotte Fisher

Whistleblowing (Making a Protected Disclosure) Policy and Procedure

Introduction – what is whistleblowing?

As a Company, we are proud of our operations and practice. We aim at all times to work in a way which is legal, ethical and morally acceptable. However, if you discover a situation which affects one or more of the following matters or other extremely serious situations which affect the public interest, you will be able to raise your concerns without fear of reprisals:

- Criminal offence or breaking the law
- Danger to Health and Safety
- Risk or actual environmental damage
- A miscarriage of justice (courts of law and legal decisions)
- Fraud or financial dishonesty
- Deliberately concealing ('covering up') any of the above

Be careful!

Whistleblowing is not a way to raise issues which do not comply with the legal definition of public interest disclosures. If you are unsure about this, ask to speak to the Director.

All employees have the right to raise very serious concerns and be protected if they raise what is called a 'protected disclosure', which is also known as 'whistleblowing'. However, these disclosures must meet certain criteria to be protected, including the manner in which you make them known.

The concern which you raise must be 'in the public interest', which means it must affect others, for example the general public. Grievances to do with your experiences at work such as issues with terms and conditions or unfair treatment should normally be dealt with under the Company's grievance procedure. If you are unclear about whether or the matter you wish to raise is a grievance or a protected disclosure, either record the matter on a Whistleblowing Report Form in accordance with the procedure below, or ask to discuss it with the Director.

Procedure

Firstly, you should raise your concerns with your line manager in writing using the Whistleblowing Report Form, making it absolutely clear that you feel it may be a protected disclosure in the public interest. If you feel unable to raise the issue with your line manager, you may submit your form to the Director.

The Company encourages people who raise protected disclosures to give their name where ever possible. You may raise a disclosure anonymously, but that may restrict the Company's ability to communicate with you about their investigation, which in turn may constrain the investigation itself.

Once you have raised the issue, the Company will undertake a full investigation and let you know the outcome, normally within seven working days. The outcome and further details will be recorded on your Whistleblowing Report Form, a copy of which will be returned to you for your records. If the confidentiality or rights of another person could be infringed, it may not be possible to record the full details on the form.

Should you wish to discuss the investigation or outcome, you should ask to meet with the investigator who completed the form.

If we cannot resolve the issue internally, then you have the right to raise protected disclosures to outside agencies, for example, the Health and Safety Executive, the Environment Agency or relevant Regulator.

There are a restricted number of bodies to whom you can make disclosures, the most up to date list can be found at <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies>

However, please ensure that you have raised the issue internally first, as failure to do so will leave you in breach of the Company's rules. If the Company believes, after investigation, that you have raised a protected disclosure without good cause, which is raised without a genuine belief, raised maliciously or for an ulterior motive, you may be liable to disciplinary action.

Whistleblowing (Protected Disclosure) Report Form – Complainant’s section

| | |
|--|--|
| Name | |
| Date of completion | |
| Form submitted to (name and job title) | |

Details of the concern/s raised

Please give as much detail as possible: what happened, what are you concerned about, where, when, who was/is involved, how you became aware of the matter, are there any witnesses other than yourself, are there any related documents or other items of evidence (if so, please attach these to the form).

Signature of complainant

Whistleblowing (Protected Disclosure) Report Form – Company section

| | |
|------------------------------------|--|
| Name and job title of investigator | |
| Date of completion | |
| Date form returned to complainant | |

Investigation details and results

Please give details of the investigation or other action which has been undertaken in relation to the complainant's concerns (omitting details due to confidentiality or the rights of others should be highlighted below).

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Outcome of the investigation

Please give details of the outcome, such as remedial action taken or future activity planned

Signature of investigator