

Whistleblowing policy

What is Whistleblowing?

“Whistleblowing” is the colloquial term for reporting suspected misconduct, illegal activities, or failure to comply with Assurco policies and procedures.

We consider whistleblowing provides essential information for the protection and improvement of the organisation, its employees and its clients. Employees often highlight issues that may otherwise have gone unnoticed. It is not disloyal to voice any serious concerns and helps us to continue to achieve high standards of service.

This Policy explains:

- Types of issues that can be raised.
- How to raise a concern.
- How the person raising a concern will be protected.
- How Assurco will handle the concern.

The Aim and Application of the Policy

Policy Aims

This policy aims to enable the whistle-blower to raise their concerns with an internal member of management safely, as opposed to feeling restricted to ignoring or reporting the issue to an outside party.

It is also designed to ensure that employees can raise their concerns without fear of negative impacts on themselves.

This Policy Aims to:

- Provide viable options for the reporting of concerns and issues
- Ensure employees feel confident in reporting concerns as soon as possible, and that their concerns will be taken seriously
- Reassure employees that they will be protected from negative reprisals where they have raised issues in good faith
- Ensure that the employee receives adequate responses and knows how to pursue further help if they are not satisfied with the response they receive.

Scope of this Policy

This policy is designed to ensure that those who have concerns about potential wrongdoing are able to report their concerns at the earliest opportunity and have confidence in the implementation of a full investigation.

However, this policy does not replace the Grievance or Client Complaint Procedures.

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Who does this policy apply to?

The Policy applies to all:

- employees
- employees of contractors
- employees of suppliers

What should be reported?

If you have any concerns regarding the conduct of anyone representing our organisation, including employees and contractors, you should report it.

This includes:

- conduct that makes you feel uncomfortable or perpetuates mis-information
- conduct that is not in keeping with our constitution and policies
- conduct that falls below our established standards
- improper behaviour or social misconduct

Improper conduct can include, but is not limited to:

- discrimination – including racial, gender, disability and others
- criminal offences or other breaches of the law
- health and safety risks to any interested party including employees, contractors, customer and members of the public
- environmental damage
- unauthorised use of organisational funds
- potential fraud or other corruption

Protecting the Whistleblower

Your legal rights

Whistleblowers are protected under the Public Interest Disclosure Act 1998, which makes it unlawful for an employee to be dismissed or otherwise victimised when they have made an appropriate and lawful disclosure in good faith.

In rare cases, the whistleblower may have been involved with the incident of concern. In this case, they must be open and honest about their involvement, and submit to any investigation.

Where this applies, the whistleblower is not exempt from potential disciplinary actions but their honesty may be taken into account in their favour.

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Harassment or Victimization

Assurco is committed to high standards of practice, and to supporting our employees in any way we can.

To this end, we do not tolerate any victimisation of an employee who has raised a concern in good faith, including harassment and social or other pressures (both formal and informal).

We will take action as appropriate to protect the whistleblower and will implement disciplinary action against perpetrators where necessary.

Support to you

Full support will be provided throughout the investigation process, and this could include relocating or otherwise changing the whistleblower's working arrangements as necessary.

Support will be provided as appropriate for whistleblowers that are not directly employed by Assurco.

Confidentiality

We will treat all concerns in confidence and make every effort to conceal your identity if that is your wish. It may not be possible to take action as a result of your disclosure without your help if the investigation results in disciplinary or other proceedings, so you may then be asked to come forward as a witness. You will be offered advice and support if you agree to this.

Allegations made anonymously

This policy is not ideally suited to concerns raised anonymously. We would encourage you whenever possible to put your name to your allegation because it is more difficult for us to protect your position or give feedback if we don't know who you are.

Anonymous concerns are less powerful, but we will still consider them where feasible. We would take into account;

- How serious we felt the issue to be
- How credible the concern appears to be, and
- How likely it is considered to be that we can confirm the allegation from other sources

Allegations that are untrue

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We will recognise your concern if it turns out that your allegation, which you made in good faith reasonably believing it to be true, is shown by our investigation not to be. In these circumstances you will have nothing to fear. However, if an allegation is made frivolously, maliciously or for personal gain, appropriate action that could include disciplinary action, may be taken.

4. How to Raise a Concern

4.1. Who should you raise your concern with?

This depends on how serious and sensitive the issues involved are and who is suspected of the wrongdoing. You should normally raise concerns with the board of directors via email: <https://www.assurco.com/contact-us/>

How to raise a concern

This can be done either by telephone, in person or in writing. The earlier you express your concern, the easier it is to act. We will need the following information:

- the nature of your concern and why you believe it to be true
- the background and history of the concern (giving relevant dates)

You will not be expected to prove beyond doubt the truth of your suspicion, but you will be required to demonstrate to the person contacted that you have a genuine concern relating to suspected wrongdoing or malpractice and there needs to be reasonable grounds for your concern.

You could discuss your concern with a colleague first because it may be easier for you to raise the matter if there are two (or more) of you who have had the same experience or concerns.

You may invite your trade union, professional association representative or a friend to be present for support during any meetings or interviews in connection with the concerns you have raised.

What we will do

Your concerns will be responded to as quickly as possible. Please note that testing your concerns is not the same as either accepting or rejecting them.

Initial enquiries will be made to decide whether an investigation is appropriate. This is to be fair to all employees, including those who may be wrongly or mistakenly accused.

Strict confidentiality may be required when undertaking the investigation, so the subject of the complaint may not be told until (or if) it becomes necessary to do so. Protection of others is paramount in all cases, so in some cases, such as allegations of ill treatment of others, suspension from work may have to be considered immediately.

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Where appropriate, the matters raised may be investigated by management, internal audit, or through the disciplinary/grievance process and if necessary, referred to the police.

The person investigating your concern will write to you within ten working days of your complaint being received, to;

- acknowledging receipt of your concern
- indicating how we intend to deal with the matter
- make sure you have information on staff support mechanisms
- tell you whether further investigations will take place and if not, why not.

It is likely that we will need to speak to you so that we ensure we fully understand your disclosure. We can arrange meetings away from your workplace if necessary.

We will ensure you receive appropriate advice and support if your disclosure leads to a prosecution.

Unless there are any legal reasons why this cannot be done, you will be kept informed of the progress and outcome of any investigation.

You should not disclose information that is confidential such as a client or contractor details, except to those included in the list of prescribed contacts.

This Policy **does not** prevent you from taking your own legal advice.

Recording and monitoring

We will maintain a register of all concerns raised, details of the investigation and outcome.