

# Whistleblowing Policy

## 1. Introduction

This policy applies to all team members and officers of Audley Group. Other individuals performing functions in relation to our business, such as agency workers and contractors, are also encouraged to use it.

It is important to the business that any fraud, misconduct, human trafficking or wrongdoing by team members, workers or officers acting on behalf of Audley Group is reported and properly dealt with. We therefore encourage all individuals to raise any concern that they may have about the conduct of others in the business or the way in which the business is run. This policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with.

### 1.1 What Is Whistleblowing?

A “whistleblower” is someone who discovers something that is wrong and alerts his employer or the relevant authorities to what is going on. The law protects whistleblowers from their employer subjecting them to detriment or dismissal by reason of their having “blown the whistle” and from detrimental treatment by their colleagues. To be protected by the law, the act of whistleblowing must fall within the legal rules and the whistleblower must reasonably believe that their disclosure of wrongdoing is made in the public interest.

At Audley we encourage our team members and workers to raise their concerns under this procedure in the first instance. If the team member or worker is not sure whether to raise a concern, he/she should discuss the issue with his/her line manager or the HR department in the first instance.

## 2. Policy

Our business is run in accordance with the law. No team member will suffer a detriment for speaking up if they believe that something is wrong.

If you have information you believe shows any of the following:

- a criminal offence was committed or is being or is likely to be committed
- a person has or is or is likely to fail to comply with a legal obligation
- a miscarriage of justice has occurred or is or is likely to occur
- the health and safety of any individual has been or is being or is likely to be endangered
- the environment has been, is being or is likely to be damaged
- that a supplier or contractor is not working with integrity and may bring the company name into disrepute, this could include bribery or human trafficking (i.e.)
- that information tending to show any matter falling within any one of the above categories has been, is being, or is likely to be deliberately concealed

Please raise your concerns immediately with your manager or the Human Resources Team.

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

However, you will still be protected in law if you disclose the information to the following:

- A legal adviser in the course of getting legal advice
- A minister of the crown
- One of the prescribed persons set out in the Public Interest Disclosure (Prescribed Persons) Order 1999 (e.g. disclosure of a danger to health and safety to the Health and Safety Executive; disclosure of fraud to the Secretary of State for Trade and Industry; disclosure of breach of tax rules to HM Revenue & Customs).

Disclosure to any other person is not generally protected except in very limited circumstances.

After you have raised a concern, we will decide how to respond in a responsible and appropriate manner. Initially this will usually involve making internal enquiries, but it may become necessary to carry out a full investigation which may be formal or informal depending on the nature of the concern raised. We will endeavour to complete investigations within a reasonable time.

We will keep you informed of progress and let you know when the investigation is completed. We will not be able to inform you of any matters which would infringe any duty of confidentiality owed to others.

If you use this policy to raise a concern in the public interest, we can assure you that you will not suffer any form of retribution or detrimental treatment.

Any team member who criticises, bullies or victimises a fellow employee by reason of their whistleblowing will be liable to disciplinary action up to and including dismissal, depending on the seriousness of the conduct.

## 2.1 Whistleblowing Line

As an additional safeguard we provide an independent confidential reporting line where a team member or worker can raise concerns and be assured, they will be fully addressed. Calls are handled by skilled professionals and will be treated in complete confidence. A report of the call will be sent to the CEO, HR Director or Company Secretary. The independent company will not disclose the team member or workers name within the report if the person reporting the issue wishes to remain anonymous.

The independent whistleblowing line is available 24/7 365 days. Details of the independent service can be found on posters which should be prominently displayed on internal noticeboards.

There are several ways to contact the company (Safecall); they can be contacted on the phone on 0800 915 1571, on their website [www.safecall.co.uk/report](http://www.safecall.co.uk/report) or email [audley@safecall.co.uk](mailto:audley@safecall.co.uk)

## 3. Review

This policy will be reviewed on a biannual basis

## 4. Referencing Other Policies

Other Audley policies which should be referred to in conjunction with this policy are noted below:

## 5. References

Safeguarding Policy  
Modern Slavery Statement