

WHISTLEBLOWING – PUBLIC INTEREST DISCLOSURE

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REVISION TABLE

Revision	Date	Comments
1	30/06/15	First Issue
2	19/05/17	Investigation process extracted to separate document

1. WHISTLEBLOWING POLICY STATEMENT

An important aspect of accountability and transparency is a mechanism to enable staff and other members of the Company to voice concerns in a responsible and effective manner. It is a fundamental term of every contract of employment that an employee will faithfully serve his or her employer and not disclose confidential information about the employer's affairs. Nevertheless, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organisation then this information should be disclosed internally without fear of reprisal.

The Public Interest Disclosure Act 1998 gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. Robert Walpole and Partners has endorsed the provisions set out below so as to ensure that no members of staff should feel at a disadvantage in raising legitimate concerns.

It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by Robert Walpole and Partners nor should it be used to reconsider any matters which have already been addressed under other procedures.

Progress in implementing this policy will be reviewed annually by the partners.

Signed:	<u>M. J. Walpole.</u>	M. J. Walpole Partner
Date:	<u>19.05.17</u>	

2. WHEN SHOULD I SPEAK UP?

This policy is designed to deal with concerns raised in relation to specific issues which are in the public interest and detailed below. Only genuine concerns should be reported.

Whistleblowing means a disclosure of information made by an employee or contractor, an external person or body where they reasonably believe that one or more of the following matters is happening now, took place in the past or is likely to happen in the future:

- a criminal offence;
- fraud;
- a failure to comply with a legal obligation (e.g. breach of a contractual or other common law obligation, statutory duty or administrative requirement, including suspected fraud and malpractice);
- a miscarriage of justice;
- a danger to the health and safety of any individual;
- damage to the environment; and
- a deliberate concealment of information tending to show any of the above.

3. WHO SHOULD I CONTACT?

A company partner should be approached in a first instance. If that is not possible a prescribed person or body should be contacted (as advised within “Whistleblowing: list of prescribed people and bodies” available on www.gov.uk).

Alternatively any safety concerns can be reported to CIRAS (Confidential Incident and Analysis System) available to anyone who works in the transport industry. Robert Walpole and Partners become member of CIRAS in 2015.

4. WHAT INFORMATION SHOULD I PROVIDE?

You can raise your concerns by email, orally or in writing, stating that you are using the Whistle Blowing Policy. We request that, where possible, you include the information below:

- an outline of the known or suspected wrongdoing;
- details, to the best of your knowledge, about when, where and how it occurred;
- a list of the names of those suspected of being involved;
- a list of the names of anyone who may have relevant information;
- details of how you came to know about the suspected activities;

- what, if any, do you estimate to be the value of the loss;
- what, if any, breaches of internal controls, policy, procedure or other requirements you believe took place;
- any specific recommendations you have for actions;
- the names of anyone who you have discussed or reported this incident to;
- your name and contact details. Please note –these will be kept confidential as far as is reasonably practicable; and
- the date and time of making the report.

You will not be expected to prove the wrongdoing that you believe you have witnessed or suspect.

5. ANONYMITY

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the Company. In exercising this discretion, the factors to be taken into account will include:

- the seriousness of the issues raised;
- the credibility of the concern;
- the likelihood of confirming the allegation from attributable sources.

6. INVESTIGATION

Any investigations undertaken through this policy will follow Robert Walpole & Partners' Investigation and Grievance Process [A44.21].

7. PROTECTION

No one who reports any concern under this policy in good faith will be subjected to any detriment for coming forward, regardless of whether or not the concern is ultimately substantiated. In the event that a reporter believes that they are being victimised or subjected to a detriment by any person within the company as a result of reporting a concern or assisting the company in any investigation under this policy they must inform the company Partner immediately and appropriate action will be taken to protect them from any reprisal.