**Involve Selection Ltd Whistle-blowing Policy Statement**

It is our aim to create and nurture a culture that is open and supportive. There may be occasions when you become aware of something seriously wrong within our company. You may not understand how to express your concerns as you feel it’s disloyal to your colleagues or the company. You may be concerned about feeling harassed or victimised and, as a result, you ignore the concern rather than report it.

Whistleblowing is the term used when you pass on information or concerns that you have relating to our company.

We would like to reassure our employees that we are committed to the highest possible standards of openness and accountability. As such, we expect our employees to raise serious concerns about any aspect of our work appropriately.

You can report concerns without fear of victimisation or subsequent discrimination or disadvantage. We encourage our employees to raise serious concerns rather than overlooking them or raising them outside of our company.

We are aware of our legal responsibility to ensure that there are internal mechanisms in place to enable you to raise legitimate concerns, along with setting out what external redress you have if you believe the concern raised has not been satisfactorily resolved. Our Leadership team support this policy and actively encourage you to raise genuine concerns without fear of reprisals.

**Responsibility for the Whistle-blowing Policy**

Our Leadership team has overall responsibility for the effective operation of this policy and for ensuring compliance with the relevant statutory framework. The Leadership team has delegated day-to-day responsibility for operating the policy and ensuring its maintenance and review to Ashley Goldman

The manager in receipt of the complaint must report concerns raised to Ashley Goldman who will keep a record along with the outcome (not breaching confidentiality). The Managing Director will report (if necessary) concerns raised, to the Board. Managers have a specific responsibility to ensure the fair application of this policy and all of our employees are responsible for supporting colleagues and ensuring its success.

**Whistle-blowing Policy Principles**

This policy applies to all of our employees. It does not apply to agency workers, consultants or the self-employed. This policy does not form part of any of our employee’s contract of employment and we may amend this policy at any time. This policy includes the process for raising concerns relating to our company.

The aims of the policy are to:

* Encourage our employees to feel confident about raising serious concerns and to question and act upon concerns relating to our practice;
* Provide avenues for you to raise concerns and receive feedback on any action that is taken;
* Ensure that you receive a response to concerns raised and that you are aware of how to pursue them if you are not satisfied;
* Reassure you that you will be protected from possible reprisals or victimisation if you have reasonable belief in the concerns raised and you have made the disclosure in good faith.

**When to Use this Policy**

You should use this policy when you genuinely believe that our company or a colleague has taken, is intending, or has failed to act which you reasonably believe will lead or amount to:

* A criminal offence (such as fraud);
* Financial mismanagement (such as fraud, stealing assets or the improper use of assets);
* Failure to comply with any legal obligations;
* A miscarriage of justice;
* Danger to the health and safety of an individual;
* Damage to the environment;
* The deliberate concealment of information relating to the concerns listed above.

This policy should not be used to address issues relating to your employment. The grievance policy should be used for these matters.

**Implications of Raising a Concern**

We are committed to good practice and high standards and we want to be supportive of you. If you reasonably believe that your concern relates to any of the areas set out in this document and you disclose the information to the appropriate person in good faith, no action will be taken against you for making the disclosure.

If you are found to be victimising a colleague for using this policy or you deter a colleague from using this policy to raise genuine concerns, you may be subject to formal action.

If a disclosure or allegation is found to be malicious or vexatious and has been made for personal gain or there were no reasonable grounds for believing that the information was accurate, disciplinary action may be taken.

**Confidentiality and Anonymity**

This policy does not affect the duty of confidentiality. Consequently, in using this policy, you must not disclose commercially sensitive data or unrelated confidential information.

It is important that concerns are dealt with sensitively and quickly. This policy encourages you to put your name on the allegation wherever possible. Anonymous disclosures are strongly discouraged as they are much less powerful. However, they would still be investigated at our discretion. In exercising discretion, the following factors are taken into account:

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

Where information is disclosed in accordance with this policy, in so far as is reasonably practical, your identity will be kept confidential. At the appropriate time, however, you may need to come forward as a witness.

**How to Raise Concerns**

Concerns should be raised with your line manager. However, dependant on the seriousness and sensitivity of the issue and who is suspected (or where there are doubts), the concern may be raised to Ashley Goldman (Managing Director).

You should, as soon as possible, raise your concerns in writing giving the details of the background and history (including dates where possible) and stating the reason for your concern. You will need to demonstrate to the person that you are contacting that there are reasonable grounds for the concern, although proof beyond reasonable doubt is not necessary.

You can also obtain confidential guidance on how to pursue matters from Ashley Goldman.

You may wish to consider discussing the concern with a colleague first. It may be easier to raise the matter if there are colleagues to support you. However, care should be exercised in respect of confidentiality on the part of everyone concerned. You may ask a colleague to accompany you to any meeting in connection with the investigation.

**Our Response**

We will respond to your concerns within 5 working days of you raising your concern with us.

In order to protect you and those accused under this policy, initial enquiries will be made to decide whether an investigation is appropriate and if so, how it should progress. The overriding principles, which we will have in mind, are our customers, our employees and the public’s interest.

Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required, this will be taken before any investigation is conducted.

Within a reasonable period of a concern being raised, and if possible, within 14 days, the responsible person will write to you to:

* Acknowledge receipt of your concern;
* Indicate how we will deal with the matter;
* Give an estimate of how long it will take to provide a final response;
* Advise whether any initial enquiries have been made;
* Advise where you may obtain support;
* Advise whether further investigation will take place and if not, why not.

The amount of contact between managers considering the issue and you will depend on the nature of the matter raised and the clarity of the information provided.

We will take steps to minimise any difficulties, which you may experience as a result of raising a concern. For instance, if you are required to give evidence as a witness in criminal or disciplinary proceedings, we will arrange for you to receive independent advice concerning the process.

We accept that you need to be reassured that we have addressed matters and subject to legal constraints, we will inform you of the outcome.

**Taking Further Action**

This policy is intended to provide you with an avenue to raise your concerns and have them addressed. If you are not satisfied with the outcome and consider it appropriate to take the matter outside the company, the following are possible contact points for you to consider:

* Citizens Advice Bureau;
* Relevant professional bodies / regulated organisations;
* Police.

Remember that you have a duty of confidentiality to us. If you do take the matter outside of the company, care should be taken to ensure that there are no disclosures of confidential and / or commercially sensitive or unrelated confidential information without the proper authorisation.

If you are not able to check this with us, you must check with the person with whom you make the external contact in order to protect them.