Whistleblowing Policy

1. INTRODUCTION

1.1 Hunter Dunning Ltd is committed to conducting its business with honesty and integrity and aims to achieve the highest possible standards of service and ethical standards in all of its practices.

1.2 We expect all staff to maintain the same high standards too; however, all organisations face the risk of things going wrong and sometimes malpractice and wrongdoing can take place. We take malpractice and wrongdoing very seriously and aim to prevent and eliminate any wrongdoing or malpractice within the organisation.

1.3 We encourage open communication from all those who work for us and we want everyone to feel secure about raising concerns therefore encourage all staff to raise any concerns they may have about malpractice or wrongdoing within the organisation freely and without fear of suffering a detriment or dismissal to enable us to eliminate and prevent wrongdoing or malpractice within the organisation.

1.4 All staff have protection under whistleblowing laws if they raise concerns in the correct way. This policy is designed to give staff that opportunity and protection. It does not matter if an individual who raises a concern is mistaken about it—staff do not have to prove anything about the allegation they are making but they must reasonably believe that the disclosure is made in the public interest and that the information they have tends to show some malpractice.

1.5 We will treat any concerns raised seriously and will protect and support any individual who makes a disclosure in line with this policy.

1.6 This policy does not form part of any contract; Hunter Dunning Ltd reserves the right to amend this policy at any time without prior notice.

2. WHO CAN RAISE A CONCERN UNDER THIS POLICY?

2.1 This policy applies to all current and former employees, workers, officers, consultants, and contractors of our business, including home workers, trainees, apprentices, agency workers, casual workers and limited company contractors.

2.2 No qualifying length of service is required in order to raise a concern under this policy.

3. WHEN TO USE THIS POLICY

3.1 This policy should be used to report concerns of malpractice or wrongdoing in relation to our organisation's activities where you have information which you reasonably believe tends to show one or more of the following:

- that a criminal offence has been committed, is being committed or is likely to be committed; or
- that a person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject; or
- that a miscarriage of justice has occurred, is occurring or is likely to occur; or
- that the health or safety of an individual has been, is being or is likely to be endangered; or
- that the environment has been, is being or is likely to be damaged; or
- that any of the above malpractices have been, are being or are likely to be deliberately concealed. This applies whether the malpractice has already occurred, is currently in progress, or is likely to happen in the future.

3.2 You must reasonably believe that the disclosure is being made in the public interest.

3.3 It doesn't matter if you are mistaken about your concern, but you must have information that tends to show some malpractice, or wrongdoing rather than an opinion or a feeling.

4. DISCLOSURES THAT ARE NOT COVERED BY THIS POLICY

4.1 You will not qualify for protection under this policy if you commit an offence in making the disclosure, or if you disclose a matter that is subject to legal, or professional privilege (for example, correspondence between Hunter Dunning Ltd and our lawyers regarding a specific case).

4.2 If your concern relates to your own treatment as an employee of Hunter Dunning Ltd, including personal circumstances at work, you should raise it under our grievance procedure instead, unless you reasonably believe that the matter is in the public interest.

4.3 If your concern relates to your own treatment or personal circumstances at work but you are not an employee of Hunter Dunning Ltd, you should use our complaints procedure instead of the grievance procedure.

Our complaints policy is available on our website and can be requested from your Line Manager.

4.4 If you wish to raise a concern of suspected malpractice or wrongdoing in relation to a hirer's activities you may need to raise the concern directly with the hirer instead.

4.5 Any other concerns about our services generally which are not related to the types of wrongdoing or malpractice covered by this policy should be raised using our complaints policy instead.

5. HOW TO RAISE A CONCERN

5.1 If you have any concerns of the types of malpractice or wrongdoing covered by this policy, you should in the first instance make a disclosure to your immediate superior. Agency workers should disclose concerns to the consultant who is responsible for managing their assignment.

5.2 If, for any reason, you feel that you cannot tell your immediate superior, or in the case of an agency worker the consultant responsible for managing your assignment, you should raise the issue with the Managing Director.

5.4 A disclosure of concern can be made by telephone, in person, or by email. However, it is preferable for the disclosure to be made via email, so that we can keep an exact record of your concern.

5.5 You are not expected to prove the truth of your concern beyond reasonable doubt, or provide any evidence; however, you will generally need to provide the following information as a minimum:

- the nature of the concern;
- why you believe it to be true;
- the background and history of the concern; and
- relevant dates where possible.

5.6 You can raise any concerns anonymously; however, we encourage you to give your name when reporting your concern wherever possible because it may be more difficult for us to protect your position or give you feedback on the outcome of investigations if you choose to remain anonymous. If you choose to remain anonymous, we will preserve your confidentiality unless the law requires otherwise. We will only make disclosures to third parties or other staff with your consent.

5.7 You may wish to consider discussing your concern with a colleague before raising it formally under this policy. You can also choose to raise a concern under this policy alone or with a colleague; however, it is in the interests of all parties to maintain confidentiality once you have raised a formal concern.

6. HOW WE RESPOND TO CONCERNS RAISED UNDER THIS POLICY

6.1. We are committed to ensuring that all disclosures raised in accordance with this policy will be dealt with objectively, consistently, fairly and professionally.

6.2. We will take the time to listen to any issues raised and arrange a meeting as soon as possible, to discuss your concern (unless the concern has been raised anonymously). The aim of the meeting will be to establish the background and facts in order to help us decide

whether and how to carry out any subsequent investigation. We may ask you for further information about the concern raised, either at this meeting or at a later stage.

6.3. You may bring a colleague, or trade union representative to any meeting that takes place. The companion must respect the confidentiality of the disclosure and any subsequent investigation.

6.4. After the meeting, we will decide how to respond. This will usually involve making internal enquiries in the first instance, but it may be necessary to carry out an investigation at a later stage which may be formal or informal depending on the nature of the concern raised. We will endeavour to complete investigations within a reasonable time.

6.5. We will keep you informed of the progress of the investigation as it is carried out and when it is completed and give you an indication of the timescale for any actions, or next steps that we may take. We cannot inform you of any matters that would breach any duty of confidentiality owed to others.

6.6. We will consider any concerns raised anonymously at our discretion, taking into account factors such as the seriousness of the issue raised, the credibility of the concern and the likelihood of confirming the allegation from other sources. However, concerns that are expressed completely anonymously are much less powerful and are difficult to investigate. It may also be difficult for us to provide you with feedback if you cannot be contacted.

6.7. If disciplinary or other proceedings follow the investigation, we may need to ask you to come forward as a witness to help us take appropriate action to end the wrongdoing.

7. CONFIDENTIALITY

7.1 All concerns raised will be treated as confidential and every effort will be made not to reveal the identity of any individual who raises a concern. Unless the law requires otherwise, we will only make disclosures to third parties or other staff with your consent.

8. RAISING YOUR CONCERN EXTERNALLY (EXCEPTIONAL CASES)

8.1 The main purpose of this policy is to give all our staff the opportunity and protection they need to raise concerns internally. We would expect that in almost all cases raising concerns internally would be the most appropriate course of action in order to resolve the issue.

8.2 However, if for whatever reason you feel you cannot raise your concerns internally and you reasonably believe the information and any allegations are substantially true and in the public interest, the law recognises that it may be appropriate for you to raise the matter with another approved person, such as a regulator, professional body, or an MP. A list of the relevant prescribed people and bodies that you can raise a concern with is available on the GOV.UK website via this link:

8.3 We strongly encourage individuals to seek appropriate advice before reporting a concern to an external person. Protect (formerly known as Public Concern at Work) is the UK's whistleblowing charity and aims to stop harm by encouraging safe whistleblowing. It is a source of further information and advice. They operate a confidential helpline. ACAS also

operate a free confidential helpline that you can contact for advice. The contact details for both organisations are set out in the information and contacts section under paragraph 10 below.

9. PROTECTION AND SUPPORT FOR THOSE RAISING CONCERNS

9.1 We hope that all staff will feel able to voice their concerns freely under this policy.

9.2. Hunter Dunning Ltd is committed to good practice and high standards and to being supportive of staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

9.3. Any individual raising a genuine concern must not suffer any detriment as a result of doing so. If you believe that you have suffered such treatment, you should inform the Managing Director immediately.

9.4. Hunter Dunning Ltd will not tolerate any harassment or victimisation of individuals who raise concerns about wrongdoing or malpractice in the workplace. No member of staff may threaten or retaliate against an individual who has raised a concern. Any person involved in such conduct may be subject to disciplinary action.

9.5. To ensure the protection of all our staff and the integrity of our business, those who raise a concern frivolously, maliciously and/or for personal gain and/or make an allegation they do not reasonably believe to be true and/or not made in the public interest may also be subject to disciplinary action.

9.6. If you are not happy with the way in which a matter has been addressed or dealt with you should raise it formally using our complaints procedure. Employees of Hunter Dunning Ltd can use our grievance procedure to address the issue instead.

10. FURTHER INFORMATION AND CONTACTS

10.1 If you have any queries about the application of this policy, please contact the Managing Director in the first instance.

10.2 Protect is a source of further information and advice. It also provides a free helpline offering confidential advice on020 3117 2520. Further information is available on their website at https://protect-advice.org.uk/ .

10.3 The Advisory, Conciliation and Arbitration Service (ACAS) also has a free helpline that you can contact for further advice. The ACAS telephone number is: 0300 123 1100 and the helpline is open Monday to Friday from 8am to 6pm.The website can be found here: www.acas.org.uk.

10.4 If you are a member of a recognised trade union, you can also seek information and advice from your trade union representative.