Whistleblowing Policy

1. About this policy

Linsco Ltd are committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

The aims of this policy are:

- To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- To provide staff with guidance as to how to raise those concerns.
- To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

1.1 This policy covers all employees, officers, consultants, contractors, volunteers, interns, those on work experience casual workers and agency workers.

1.2 This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. Personnel responsible for the policy

2.1 The Board of Directors has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

2.2 The Whistleblowing Officer has day-to-day operational responsibility for this policy and must ensure that all managers and other staff who may deal with concerns or investigations under this policy receive regular and appropriate training.

2.3 The Whistleblowing Officer, in conjunction with the Board should review this policy from a legal and operational perspective at least once a year.

2.4 All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Whistleblowing Officer.

3. What is whistleblowing?

3.1 Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- Criminal activity
- Failure to comply with any legal or professional obligation or regulatory requirements
- Miscarriages of justice
- Damage to the environment
- Danger to health and safety
- Bribery under our Anti-corruption and Bribery policy
- Facilitating tax evasion contrary to our Tax Evasion policy
- Financial fraud or mismanagement
- Breach of our internal policies or procedures
- Conduct likely to damage our reputation or financial wellbeing
- Unauthorised disclosure of confidential information
- Negligence
- The deliberate concealment of any of the above matters

3.2 A Whistle blower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy.

3.3 This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Procedure or Anti-Harassment and Bullying policy is appropriate.

3.4 If you are uncertain whether something is within the scope of this policy you should seek advice from the Whistleblowing officer, whose contact details are at the end of this policy.

4. Raising a whistleblowing concern

4.1 We hope that in many cases you will be able to raise any concerns with your Manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases, they may refer you to the Whistleblowing officer.

4.2 However, where the matter is more serious, or you feel that your Manager has not addressed your concern, or you prefer not to raise it with them for any reasons you should contact one of the following.

- The Whistleblowing officer/Director, Rob McCafferty
- Managing Director, Natalie Evans

Contact details are set out at the end of this policy

4.3 We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

4.4 We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

5. Confidentiality

5.1 We hope that staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

5.2 We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot contain further information from you. It is also more difficult to establish whether any allegations are credible. Whistle-blowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowing Officer or one of the other contact points listed in 10. and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt, you can seek advice from protect, the independent whistleblowing charity, who offer confidential helpline. Their contact details are at the end of this policy.

6. Investigation and outcome

6.1 Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

6.2 Ins some cases, we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of further wrongdoing.

6.3 We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

6.4 If we conclude that the whistle-blower has made false allegations maliciously, the whistle-blower will be subject to disciplinary action.

7. If you are not satisfied

7.1 While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.

7.2 If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts in 10.

8. External disclosures

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

8.2 The law recognises that in some circumstances it may be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protech, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

8.3 Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a client, customer, supplier or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first. You should contact your manager or one of the other individuals set out in 10. for guidance.

9. Protect and support for whistle-blowers

9.1 It is understandable that whistle-blowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

9.2 Whistle-blowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing officer immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

9.3 You must not threaten or retaliate against Whistle-blowers in any way. If you are involved in such conduct, you may be subject to disciplinary action. In some cases, the Whistle-blower could have a right to sue you personally for compensation in an employment tribunal.

10. Contacts

Whistleblowing officer
Rob McCafferty
07817684423
Rob.mccafferty@linsco.com

Directors
Natalie Evans
07970389104
Natalie.evans@linsco.com

Protect (Independent Whistleblowing charity)
Help line – 02031172520
www.protect-advice.org.uk
Confidential disclosures email - Whistleblowing@linsco.com

Signed



Natalie Evans,
Managing Director