

Whistleblowing Policy

This document describes our policy relating to the reporting by employees of suspected misconduct, illegal acts or failure to act within the firm as part of our effective risk management system

This policy is designed to work in conjunction with the following policies:

- [Conflicts of Interests Policy](#)
- [Gifts and Hospitality Policy](#)
- [Anti-Bribery and Corruption Policy](#)
- [Ethical Code and Conduct](#)

Revision History

	A	B	C	D	E	F
1	Revision	Date	Status	Reason(s) for change	Who	Notes
2	05/001	Sept 2016	Draft + issue	New Policy Document	Sue Drake	Draft & first document issue
3	05/002	April 2018	Draft	Annual review of policy	Sue Drake	SD reviewed and amended policy
4	05/002		Approved			Compliance Approval
5	05/003	May 2020	Revised	Update, new format	Sian Elmore	as per advice from compliance consultant
6	05/003	May 2020	Approved		Dave George	
7		September 2020	Review	Document retention		Changed document retention period to align with regulator's expectations.
8		21/9/20	Approved		David George	

Policy Owner(s) and Key Individuals

	A	B	C	D
1		Name	Job Role	Notes
2	Policy owner	Dave George	CEO	
3	Relevant persons	Sue Drake	Finance	Compliance officer until mid-2019
4		Sian Elmore	EA to CEO	

1. When should you consider whistle blowing?

You should consider whistleblowing when you have reasonable belief that one or more of the following has been, is being or is likely to be committed:

- a criminal offence.
- a failure to comply with any legal obligation.
- a miscarriage of justice.
- the putting of the health and safety of any individual in danger.
- damage to the environment; or
- deliberate concealment relating to any of the above.

2. How can you do it?

The Public Interest Disclosure Act 1998 (PIDA) provides guidance for dealing with whistle blowing issues in a safe and constructive way.

If you want free, confidential advice on what is protected by PIDA and how best to raise your concern, you can contact the charity Protect on +44 (0)20 3117 2520. Their website is www.protect-advice.org.uk.

The PIDA encourages you to raise concerns internally in the first instance. We hope that you will feel able to raise any such concern internally, confident that it will be dealt with properly and that all reasonable steps will be taken to protect you from victimisation. If you don't feel able to raise or resolve a concern with your line manager, please contact the CEO and MLRO (Money Laundering Reporting Officer), David George.

If you are not comfortable raising the matter internally, you can e-mail the FCA direct on whistle@fca.org.uk. Further information is also available at <https://www.fca.org.uk/firms/whistleblowing>. The FCA could be contacted if one of the following apply:

- you are concerned about something that is relevant to the functions of the FCA
- you've disclosed your worry internally and you are concerned either by the response or lack of response
- you feel unable to talk to anyone internally for whatever reason

Please note that there are other bodies prescribed under PIDA for a range of matters apart from financial services.

3. How are you protected?

Raising a genuine concern about a matter noted above would be a *qualifying disclosure*. The Public Interest Disclosure Act 1998 (PIDA) states that individuals who make qualifying disclosures of information in the public interest have the right not to suffer detriment by any act or omission of their employer because of the disclosure. Nothing in a contract of employment prohibits you from disclosing concerns in relation to the Public Interest Disclosure Act 1998. And, any individual raising concerns will be supported and protected from reprimand.

PIDA protects you if you contact the FCA where:

- you satisfy the test for speaking to your employer (see above)
- you reasonably believe the information and allegations are substantially true; and
- you reasonably believe the FCA is responsible for the issue in question.

Any concern raised will be dealt with openly, as it aims to improve the workings of the firm and reduce risk that the firm may face. However, you can be assured that your confidentiality will be respected. For both the firm and the individual, any findings in relation to the above activities or any imposed obstruction to the openness to report concerns, could bring into question the fitness and propriety of the party concerned.

Please note that false, or malicious allegations will be dealt with accordingly.

4. Document Retention

This document is reviewed and updated annually. It is retained for 6 years from the date at which it is superseded by a more up to date policy.