

Whistleblowing procedure

NB: These policy templates are provided as general examples for informational purposes only. We're not lawyers, and nothing in these documents should be taken as legal advice. The templates were created in 2025 and may not reflect future legal changes. Employment laws vary by country, state, and even city, so always check current regulations and consult professional legal or HR advisors before implementing any policies in your organization.

About this policy

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 from occurring and to address them when they do occur.

You should report suspected wrongdoing as soon as possible, but in the knowledge that your concerns will be taken seriously and investigated as appropriate, that your confidentiality will be respected and that you will not be discriminated against for what you report, even if it turns out to be mistaken (provided the report was made in good faith).

This policy covers the whole team.

The [insert job title] is 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.

You can contact the Whistleblowing Officer at [insert email], all communication with them in relation to this policy will remain confidential where possible.

What is whistleblowing?

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

- 1.** Criminal activity;
- 2.** Failure to comply with any legal or professional obligation or regulatory requirements;
- 3.** Danger to health and safety;
- 4.** Damage to the environment;
- 5.** Bribery under our Anti-corruption and Bribery Policy;
- 6.** Financial fraud or mismanagement;
- 7.** Breach of our internal policies and procedures, including our Rules of Conduct;
- 8.** Conduct likely to damage our reputation or financial wellbeing;
- 9.** Unauthorised disclosure of confidential information;
- 10.** Negligence;
- 11.** The deliberate concealment of any of the above matters.

Failure to maintain satisfactory standards of conduct may result in action being taken under this policy.

A whistleblower is a person who raises a genuine concern relating to any of the above and who does so in the public, rather than their personal, interest. 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.

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 other more appropriate policies.

If you are uncertain whether something is within the scope of this policy you should seek advice from the Whistleblowing Officer.

Raising a whistleblowing concern

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 the matter to the Whistleblowing Officer.

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 reason, you should contact the Whistleblowing Officer.

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.

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.

Confidentiality

We hope that you 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.

We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the

Whistleblowing Officer and appropriate measures can then be taken to preserve confidentiality.

Investigation and outcome

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.

In 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 future wrongdoing.

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.

If we conclude that a whistleblower has made false allegations maliciously, the whistleblower will be subject to disciplinary action.

External disclosures

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern.

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 customer, 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 the Whistleblowing Officer.

Protection and support for whistleblowers

It is understandable that whistleblowers 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.

Whistleblowers must not suffer any detrimental treatment as a result of raising a concern that they reasonably consider to be in the public interest and that is covered by the definition of 'Whistleblowing'. 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.

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