

WHISLTE BLOWING POLICY & PROCEDURE

Summary

This policy applies to all employees and workers of Connect It. Other individuals performing functions in relation to the organisation, such as agency workers and contractors, are encouraged to use it.

It is important that any fraud, misconduct or wrongdoing by workers or officers of Connect It is reported and properly dealt with. Connect It therefore encourages all individuals to raise any concerns that they may have about the conduct of others in the business or the way in which the business is run. This policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with.

Background

The law provides protection for workers who raise legitimate concerns about specified matters. These are called "qualifying disclosures". A qualifying disclosure is one made in the public interest by a worker who has a reasonable belief that:

- a criminal offence;
- a miscarriage of justice;
- an act creating risk to health and safety;
- an act causing damage to the environment;
- a breach of any other legal obligation; or
- concealment of any of the above;

is being, has been, or is likely to be, committed. It is not necessary for the worker to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. The worker has no responsibility for investigating the matter - it is Connect Its responsibility to ensure that an investigation takes place.

A worker who makes such a protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimised, because he/she has made a disclosure.

Connect It encourages workers to raise their concerns under this procedure to their Manager in the first instance. If a worker is not sure whether or not to raise a concern, he/she should discuss the issue with his/her manager or HR.

Principles

Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Workers should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.

Any matter raised under this procedure will be investigated by a Manager and/or Compliance thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the worker who raised the issue.

Connect It recognise that it may be difficult for an employee or worker to speak out but do its utmost to ensure no worker will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the worker will not be prejudiced because he/she has raised a legitimate concern.

Victimisation of a worker for raising a qualified disclosure will be a disciplinary offence. If misconduct is discovered as a result of any investigation under this procedure Connect It's disciplinary procedure will be used, in addition to any appropriate external measures.

Maliciously making a false allegation is a disciplinary offence. An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, workers should not agree to remain silent. They should report the matter to a director or HR & Compliance.

Procedure

- 1.1 In the first instance, and unless the worker reasonably believes his/her manager to be involved in the wrongdoing, or if for any other reason the worker does not wish to approach his/her manager, any concerns should be raised with the worker's manager. If he/she believes the manager to be involved, or for any reason does not wish to approach the manager, then the worker should proceed straight to stage 1.3.
- 1.2 The manager will arrange an investigation into the matter (either by investigating the matter him/herself or immediately passing the issue to HR & Compliance who will determine the most appropriate investigation). The investigation may involve the worker and other individuals involved giving a written statement. Any investigation will be carried out in accordance with the principles set out above. The worker's statement will be taken into account, and he/she will be asked to comment on any additional evidence obtained. The manager (or the person who carried out the investigation) will then report to the Directors, who

will take any necessary action, including reporting the matter to any appropriate government department or regulatory agency. If disciplinary action is required, the manager (or the person who carried out the investigation) will report the matter to the Human Resources and start the disciplinary procedure. On conclusion of any investigation, the worker will be told the outcome of the investigation. If no action is to be taken, the reason for this will be explained.

1.3 If the worker is concerned that his/her manager is involved in the wrongdoing, has failed to make a proper investigation or has failed to report the outcome of the investigations, he/she should inform HR & Compliance or a Director in writing. They may arrange for another manager to review the investigation carried out, make any necessary enquiries and make his/her decision. Any approach will be treated with the strictest confidence and the worker's identity will not be disclosed without his/her prior consent.

1.4 If on conclusion of stages 1.1, 1.2 and 1.3 the worker reasonably believes that the appropriate action has not been taken, he/she should report the matter to the proper authority.. UK legislation sets out a number of bodies to which qualifying disclosures may be made. These include:

- HM Revenue & Customs;
- the Financial Conduct Authority (formerly the Financial Services Authority);
- the Competition and Markets Authority;
- the Health and Safety Executive;
- the Environment Agency;
- the Independent Office for Police Conduct; and
- the Serious Fraud Office.

Data protection

When an individual makes a disclosure, Connect It will process any personal data collected in accordance with its Data Protection Policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.