

Hope 4 (Rugby) Ltd. Whistleblowing Policy

Introduction

Hope 4 (Rugby) Ltd. encourages employees to raise genuine concerns about suspected wrongdoing at the earliest practicable stage. Suspected wrongdoing within Hope 4 (Rugby) Ltd. is taken seriously and employees will not be victimised or subjected to any detriment if they raise legitimate concerns in good faith.

Purpose and scope

This policy provides a procedure to ensure that concerns about suspected wrongdoing within our company ("whistleblowing") are raised and dealt with at an early stage and in an appropriate manner. It applies to all employees working at all levels of the organisation, as well as other workers, including volunteers, Trustees, temporary staff, employed contractors or networked organisations.

You are encouraged to report any genuine concerns which you may have about suspected wrongdoing in accordance with this policy, in the knowledge that your concerns will be taken seriously and investigated as appropriate. You are also protected by law against suffering any detrimental treatment for doing so.

You should use Hope 4 (Rugby) Ltd.'s grievance policy rather than this policy to raise grievances about your own personal employment situation or allegations about poor treatment at work. If you are unsure under which policy a concern should be raised, please speak to either your Line Manager or the Company Secretary.

What is whistleblowing?

Whistleblowing is the disclosure of information relating to wrongdoing or dangers at work. This includes criminal activity, failure to comply with any legal obligation or regulatory requirements, bribery, fraud or financial irregularity, and actions that are dangerous to the health and safety of people or to the environment, or the deliberate concealment of information about any of these matters.

When should this policy be used?

You must use this policy if you have a genuine concern about past, current or future wrongdoing or danger. It may not always be clear whether the conduct which concerns you amounts to wrongdoing and you will need to form your own judgment. Hope 4 (Rugby) Ltd. would encourage you to report your concerns where you are in doubt.

How to report a concern

If you have a concern, you should consider the process set out below and report it through the recommended channel(s), either orally or in writing.

You should be able to raise any concerns with your Line Manager in the first instance. You may raise any concerns in person or put the matter in writing if you prefer. Your Line Manager may be able to agree with you a way of resolving your concern quickly and effectively.

Where the matter is more serious, however, or you feel that your Line Manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact the Chairperson of the Trustees:

If Hope 4 (Rugby) Ltd. decides that it is necessary and appropriate, a meeting will be arranged with you to discuss your concern. In these circumstances, we will prepare a written summary of your concern and

provide you with a copy after the meeting. You may bring a colleague or union representative to the meeting, but your companion must respect the confidentiality of your disclosure and any subsequent investigation.

If you have any personal interest in the matter you should declare it when raising the concern.

Confidentiality

We hope that you will feel able to raise any genuine concerns openly under this policy. Hope 4 (Rugby) Ltd. does not encourage staff to make disclosures anonymously since this makes proper investigation difficult or impossible. If you want to raise your concerns confidentially, Hope 4 (Rugby) Ltd. will take reasonable steps to keep your identity secret. Disclosure of your identity may, however, become unavoidable in the case of an investigation or court proceedings.

How Hope 4 (Rugby) Ltd. will handle the matter

Once you have reported your concern, the matter will be assessed to decide what action should be taken. This may involve an internal investigation or a referral for external investigation. You will be informed who is responsible for handling the matter, how the person can be contacted and whether any further assistance may be needed from you. You may, for example, be required to attend additional meetings in order to provide further information.

Hope 4 (Rugby) Ltd. may - where confidentiality allows - give you feedback on the matter, including the progress of the investigation and likely timescale, but it is not obliged to do so. 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 must treat any feedback given to you about the investigation as entirely confidential.

If it is considered more appropriate to deal with your concern under the grievance policy, you will be informed of this.

If you are dissatisfied with the manner in which Hope 4 (Rugby) Ltd. has dealt with a concern you have reported, or with the outcome of an investigation, you may contact the Chairperson of the Trustees or one of the other Trustees. Further investigations may be undertaken if considered appropriate by that person.

Misuse of the policy

It is a very serious matter to raise a concern which you know to be false or which is made in bad faith, maliciously, recklessly or which is made with a view to personal gain. Such action may amount to gross misconduct and result in disciplinary action under Hope 4 (Rugby) Ltd.'s disciplinary policy.

Hope 4 (Rugby) Ltd. will not tolerate harassment or victimisation of anyone raising a genuine concern under this policy and any person involved in either threatening or retaliation against a whistleblower will be subject to disciplinary action. If you are harassed or victimised in any way you should inform the person responsible for investigating the matter, so that appropriate action may be taken.

Independent advice

If you have any questions in relation to this policy, you may discuss them (without being required to make a formal report) with any of the Trustees. If your questions remain unresolved or you want independent advice at any stage, you may contact the independent charity, Public Concern at Work, on 020 7404 6609. Their lawyers can give free confidential advice at any stage about how to raise a concern about suspected wrongdoing at work.

External reporting

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying suspected wrongdoing at work. The law recognises, however, that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external. If you are unsure whether this is appropriate and do not feel able to discuss the matter internally with one of the individuals named at paragraphs 5.2 or 5.3, the independent charity, Public Concern at Work, operates a confidential helpline and will be able to advise you on the circumstances in which you should contact an external body rather than raise the matter internally. 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, supplier or service provider. In some circumstances the law allows you to raise a concern with a third party directly. However, we encourage you to report such concerns internally first. You should contact the Company Secretary or a Trustee for guidance in the first instance.

Please note that it will rarely, if ever, be appropriate for you to go to the media with a concern about suspected wrongdoing before the good practice outlined in this policy document has first been practised.

Status

This policy is intended only as a statement of Company policy and management guidelines. It does not form part of your contract of employment and has no contractual effect.

Agreed by the Board of Trustees, June 2015.

Review date: **annually**

Reviewed June 2016. June 2017.