



ONE WAY
WHISTEBLOWING POLICY
VERSION: MAY 2021



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BUILDING YOUR FUTURE

www.oneway.co.uk

Head Office: Units 6-7 Crosshouse Centre, Cross House Road, Southampton, SO14 5GZ
Tel: 02380 981605



Whistleblowing Policy

One Way is committed to conducting its business with honesty and integrity, and expects everyone 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 or to address them when they do occur.

The aims of this policy are:

- To encourage you 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 you with guidance as to how to raise those concerns.
- To reassure you that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- This policy applies to all individuals working at all levels of the organisation, including senior managers, officers, directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term workers, casual and agency staff and volunteers.

What is whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers in relation to our activities. This may include:

- fraud or other criminal activity;
- facilitation of tax evasion;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;
- failure to comply with any legal or professional obligation or regulatory requirements;
- bribery;
- financial fraud or mismanagement;
- negligence;
- breach of One Way's internal policies and procedures;
- conduct likely to damage One Way's reputation;
- unauthorised disclosure of confidential information;
- the deliberate concealment of any of the above matters.

A whistleblower 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 One Way's 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 Grievance Procedure or Anti-harassment and Bullying Policy as appropriate.

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

Raising a whistleblowing concern

One Way hopes that in many cases you will be able to raise any concerns with your line 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. However, where the matter is more serious, 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 a Director.

One Way 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.



One Way will take down a written summary of your concern and provide you with a copy after the meeting. One Way will also aim to give you an indication of how it proposes to deal with the matter.

Confidentiality

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

One Way does not encourage anyone to make disclosures anonymously. Proper investigation may be more difficult or impossible if One Way 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 a Director 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 a confidential helpline. Their contact details are at the end of this policy.

External disclosures

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

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.

One Way strongly encourages 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. Their contact details are at the end of this policy.

Whistleblowing concerns usually relate to the conduct of employees, 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 will protect you if you raise the matter with the third party directly. However, One Way encourages you to report such concerns internally first. You should contact your line manager or a director for guidance.

Investigation and outcome

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

In some cases One Way may appoint an investigator or team of investigators including employees 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.

One Way will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent One Way 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 One Way conclude that a whistle-blower has made false allegations maliciously or with a view to personal gain, the whistle-blower will be subject to disciplinary action.

If you are not satisfied

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

If you are not happy with the way in which your concern has been handled, you can raise it with one of the Directors.

Protection and support for whistleblowers

It is understandable that whistleblowers are sometimes worried about possible repercussions. One Way aims to encourage openness and will support employees 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 genuine 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 a Director immediately. If the matter is not remedied you should raise it formally using the 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.

If One Way concludes that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

Responsibility for the success of this policy

Everyone is responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Everyone is invited to comment on this policy and suggest ways in which it might be improved.

Contacts

Protect (Independent whistleblowing charity)	Helpline: 0203 117 2520 E-mail: whistle@pcaw.co.uk Website: www.pcaw.co.uk
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Signed Date: May 2021

Paul Payne, Managing Director