

WHISTLEBLOWING POLICY

The Public Interest Disclosure Act, which came into effect in 1999, gives legal protection to employees against being dismissed or penalised by The Wild Hub because of publicly disclosing certain serious concerns. This policy sets out The Wild Hub's commitment to ensure no employee should feel at a disadvantage in raising legitimate concerns, also known as "whistleblowing."

The Wild Hub wishes to be open, honest, and transparent and we encourage employees to raise any concerns in a responsible and effective manner. It is a fundamental term of every contract of employment that employees will faithfully serve their employer and not disclose confidential information about the Wild Hub's affairs (see also the Confidentiality Policy).

(a) Qualifying Disclosures

If an employee discovers information which they believe shows serious malpractice, impropriety, or wrongdoing then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of their manager. It also covers concerns which are in the public interest and may initially be investigated separately but might then lead to disciplinary action.

These concerns could include:

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation.
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- A miscarriage of justice
- Attempts to conceal any of the above

These disclosures are prescribed by law as **qualifying disclosures**. These acts can be in the past, present, or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen.

(b) Safeguarding

This policy offers protection to any employee who discloses such concerns provided the disclosure is made:

- in good faith.
- in the reasonable belief that there is or was malpractice or impropriety.

It should be noted that malicious or wild allegations could lead to legal action.

The Wild Hub CIC

The Wild Hub will treat all disclosures in a confidential and sensitive manner. Employees are encouraged to put their name to any disclosures, but the CIC appreciates that this may be difficult, and discretion will be used to keep their identity confidential so long as it does not hinder or frustrate any investigation.

This process may reveal the source of the information and the employee making the disclosure may need to provide a statement as part of the evidence required. In exercising this discretion, the factors to be considered will include:

- The seriousness of the issues raised.
- The credibility of the concern.
- The likelihood of confirming the allegation from attributable sources.

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual and or legal action on the part of the person(s) complained about. Therefore, the procedure to make a protected interest disclosure as defined below should be made truthfully and honestly.

(c) Procedure

An employee should report any concerns they may have to their manager who will treat the matter with complete confidence.

Complaints will be investigated by a director unless the complaint is against or is in any way related to the actions of the Director. In this case an external HR Consultant and/or external legal advisor will investigate the complaint.

The complainant may take their complaint directly to the Managing Director.

If there is evidence of criminal activity, then the investigating Manager should inform the police. The CIC will ensure that any internal investigation does not hinder a formal police investigation.

(d) Timescales

Due to the varied nature of these types of complaints, which may involve internal investigators and / or the police, it is not possible to lay down precise timescales. The investigating manager will ensure that any investigation is undertaken as quickly as possible without affecting the quality and depth of the investigation.

As soon as reasonably practicable, the employee will be sent a written acknowledgement of their complaint and be advised of the outcome of the investigation and any action taken. If the investigation proves lengthy the investigating manager will keep the employee informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded.

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Investigating Procedure

The investigating manager should follow these steps:

- obtain full details and clarifications of the complaint.
- inform the employee against whom the complaint is made as soon as is possible. They will be advised of their right to be accompanied by a fellow worker or trade union official at any future interview or hearing held under this procedure.
- consider the involvement of the auditors and the police if appropriate and advise the Managing Director.
- fully investigate the allegations.
- prepare a report about the validity of the complaint and what action to take. If the complaint is shown to be justified, then the disciplinary or other appropriate CIC procedures will be invoked.
- inform the employee of the progress of the investigations and, if appropriate, of the outcome.

If the employee is not satisfied that their concern is being properly dealt with by the investigating manager, they have the right to raise the matter to a director.

If the investigation finds the allegations unsubstantiated but the employee is not satisfied with the outcome of the investigation, the CIC recognises the employee's lawful right to make disclosures to external bodies e.g., Health and Safety Executive, the Audit Commission, etc.