

# Bluefan Group Ltd

# Whistleblowing Policy

**Approved by:** Laurence Green

**Job Role:** Managing Director

**Signed:** *Laurence Green*

**Date:**

**This policy must be reviewed by the following date:** Oct 1, 2024

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## Whistleblowing Policy

Bluefan Group Ltd is committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards following our policies and procedures. However, we recognise that there is a 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 to prevent such situations occurring or to address them when they do occur.

The aims of this policy are to:

- Encourage staff 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.
- Provide staff with guidance as to how to raise those concerns. And,
- Reassure staff 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 everyone who carries out work for the firm in the UK, including:

- Partners
- Employees
- Contractors and sub-contractors
- Agency staff
- Consultants
- Work experience or other trainees

### What is whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing (generally a breach of a legal, statutory, or regulatory requirement or unethical, immoral behaviour). This may include:

- Violation of a legal requirement - e.g., health and safety obligations owed by the firm or an individual.
- General malpractice - such as immoral, illegal, or unethical conduct.
- Gross misconduct.
- Potential breach of the requirements in, or made under, The Pensions Act 2004, Proceeds of Crime Act 2002, or Bribery Act 2010.

If you have any genuine concerns related to any of the above, you should report it under this policy.

## Protected disclosures

An individual making a "protected disclosure" is given statutory protection from victimisation under the Public Interest Disclosure Act 1998 (PIDA), provided the disclosure is in the public interest.

A "protected disclosure" is any disclosure of information which - in the reasonable belief of the individual making the disclosure - tends to show that one or more of the following has been committed, is being committed or is likely to be committed. The disclosure must be made following certain conditions - these conditions are less demanding if the disclosure is made internally:

- A criminal offence.

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- A failure to comply with any legal obligation.
- A miscarriage of justice.
- The putting of someone's health or safety in danger.
- Damage to the environment.
- Deliberate concealment of information relating to any of the above.

It is immaterial whether the information is confidential and whether the incident occurred, occurs or would occur in the UK or elsewhere and whether the law applying to it is that of the UK or any other country or territory. A legal obligation can include a contractual or other civil obligation as well as an obligation under criminal law.

Specific instances of wrongdoing as described above under "What is whistleblowing", for example breaches of codes of conduct of professional institutions, do not constitute a protected disclosure. You should seek advice if unsure on this point. (See 'Where can I get independent advice?' below).

## Raising a whistleblowing concern

All whistleblowing disclosures will be treated as confidential and will be reported accordingly.

Please contact the company Director Laurence Green directly in person or by email for any issue to be reported.

You should make it clear that you are making your disclosure within the terms of our whistleblowing policy. This will ensure that we take the necessary action to investigate the disclosure and to protect the whistle-blower's identity.

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

## Confidentiality

We hope that staff will feel able to voice 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 raise concerns anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more challenging to establish whether any allegations are credible. If you are concerned about possible reprisals if your identity is revealed, you should come forward to the Company Director and appropriate measures can be taken to preserve confidentiality. Anonymous concerns will nevertheless be taken seriously and investigated as thoroughly as possible. Bluefan Group Ltd is not accountable for maintaining anonymity where you have told others of the alleged issue.

## Protection and support for Whistle-blowers

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Understandably, Whistle-blowers are sometimes worried about possible repercussions. Bluefan Group Ltd aim to encourage openness and will support staff members that raise genuine concerns under this policy, even if they turn out to be mistaken.

## External disclosures

This policy aims 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. In some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator, e.g. the Health and Safety Executive. It will rarely if ever be necessary to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external (excluding the Unions or any independent whistleblowing charity). 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.

## Independent advice

Individuals can contact the independent charity 'Protect' for free, independent, and confidential advice, for example, to find out what is protected by PIDA and how best to raise concerns. The charity runs a UK helpline on 020 3117 2520 and a Scottish helpline on 0141 550 7572.

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