



# Whistleblowing Policy

Version 1.0

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## Version Control

Version	Owner	Reviewer	Changes	Approval date	Next Review
1.0	Michael Walsh	Monica Whitefield	Initial version or first version uploaded on portal - see ESG share for historical information	07/2021	11/2021

## About this policy

Newable is committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards in accordance with the Newable Employee Handbook. 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 and 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.
- To provide staff with guidance as to how to raise those concerns.
- To 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 covers all employees, officers, consultants, contractors, volunteers, interns, casual workers and agency workers.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

## Personnel responsible for the policy

The Board has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy. The Audit Committee will be kept informed of any whistleblowing event.

The Whistleblowing Officer has day-to-day operational responsibility for this policy, and must ensure that all line managers and other staff who may deal with concerns or investigations under this policy receive regular and appropriate training.

The Whistleblowing Officer, in conjunction with the board, should review this policy from a legal and operational perspective at least once a year.

All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Whistleblowing Officer.

## What is whistleblowing?

**Whistleblowing** is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- criminal activity such as tax evasion or the facilitation of tax evasion;
- failure to comply with a legal obligation;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;
- fraud;
- serious breach of our policies, procedures or code of conduct; or
- the deliberate concealment of information about 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 our activities (a **whistleblowing concern**) you should report it under this policy as soon as possible.

This policy should only be used where there is a belief that wrongdoing has taken place, whether intentionally or unknowingly. It 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 & Bullying* procedure as appropriate.

If you are uncertain whether something is within the scope of this policy you should seek advice from the Whistleblowing Officer, whose contact details are at the end of this policy.

## Raising a whistleblowing concern

We hope 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. In some cases they may refer the matter to the Whistleblowing Officer.

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 one of the following:

- The Whistleblowing Officer, Monica Whitefield; or
- The Chief Executive Officer, Chris Manson

The Whistleblowing Officer or the Chief Executive, whichever you raise your concern with, will notify the Chair of the Board of directors about any whistleblowing.

If, exceptionally, the concern is about the Chief Executive, your concern should be raised with the Chair who will consult the Whistleblowing Officer and decide how the investigation will proceed.

Contact details are set out at the end of this policy.

We 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.

We will make a written summary of your concern and provide you with a copy after the meeting. We will also give you an indication of how we propose to deal with the matter.

## Confidentiality

We hope that staff will feel able to voice whistleblowing 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.

If a disclosure is made anonymously, proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. For these reasons we do not encourage staff to make disclosures anonymously and if we do receive an anonymous disclosure the Whistleblowing Officer may take reasonable steps to verify that you are a person in one of the categories to whom this policy applies as described under *About this policy*.

Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowing Officer or one of the other contact points listed under *Contact information*, and where appropriate, measures can then be taken to preserve confidentiality. If you are in any doubt you can seek advice from Public Concern at Work, the independent whistleblowing charity, who provide a confidential helpline. Their contact details are also included under *Contact information*.

## Investigation and outcome

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment which could include a decision not to take any further action. You may be required to attend additional meetings in order to provide further information.

In some cases we may appoint an investigator or team of investigators including staff 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.

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 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 we conclude that a member of staff who is the subject of a whistleblowing concern is guilty of misconduct, that person may be subject to disciplinary action in accordance with the company's disciplinary procedure.

If we conclude that a whistleblower has made false allegations maliciously, in bad faith or with a view to personal gain, the whistleblower may be subject to disciplinary action in accordance with the company's disciplinary procedure.



## If you are not satisfied

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.

If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts listed under *Contact information*. Alternatively, you may contact the Chair of the Board of directors or our external auditors. Contact details are set out under *Contact information*.

## 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. We strongly encourage you to seek advice before reporting a concern to anyone externally. The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline. 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 will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first. You should contact your line manager or one of the other individuals set out under *Contact information*.

## Protection and support for whistleblowers

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff 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 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 the Whistleblowing Officer immediately. If the matter is not remedied you should raise it formally using our 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.

## Contact information Whistleblowing Officer

Monica Whitefield  
Telephone: 020 7940 1552  
Mobile: 07803 524 450  
[monica.whitefield@newable.co.uk](mailto:monica.whitefield@newable.co.uk)

## Chief Executive Officer

Chris Manson  
Telephone: 020 7940 1509  
Mobile: 07896 753 499  
[chris.manson@newable.co.uk](mailto:chris.manson@newable.co.uk)

## Chair of the Board of Directors

Cllr Guy Nicholson  
Telephone: 020 8356 3270  
Mobile: 07976 113 448  
[guy.nicholson@hackney.gov.uk](mailto:guy.nicholson@hackney.gov.uk)

## Newable's external auditors

**BDO**  
Tim Nethercoat, Partner  
Telephone: 020 7893 2983  
Mobile: 07800 682 147  
[tim.nethercoat@bdo.co.uk](mailto:tim.nethercoat@bdo.co.uk)

**RSM**  
Vicki Richardson, Manager  
Mobile: 07734 683 811  
[vicki.richardson@rsmuk.com](mailto:vicki.richardson@rsmuk.com)

## Independent whistleblowing charity

**Protect**  
Telephone: 020 3117 2520  
[whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk)  
<http://www.protect-advice.org.uk>