



BLOWING THE WHISTLE ON MALPRACTICE

Introduction

You will often be the first to know when a colleague is doing something illegal or improper. However, you may feel nervous about voicing your concerns – possibly out of loyalty to your colleague, a belief that your concerns will not be taken seriously, or a fear that you will be bullied or dismissed. We take all forms of malpractice very seriously, whether it is committed by an employee (at whatever level), a supplier or a contractor. If you have knowledge of wrongdoing, we believe that it is in nobody's interests for you to remain silent. But how exactly do you go about disclosing your concerns? The following points are designed to guide you.

What sort of activities should I report?

It is not feasible to list every activity that constitutes misconduct or malpractice. But broadly speaking, we would expect you to report any of the following:

Breaches of security, theft, fraud or other criminal offences such as assault.

Failure to comply with legal obligations – for example in relation to health and safety of employees or the public, anti-discrimination legislation or environmental protection laws.

Harassment or bullying.

Actions intended to conceal any of the above

Behaviour which might damage the Companies reputation.

You will clearly need to make a judgement as to which category a particular action falls into. However, we would prefer you to report your concerns rather than keep them to yourself. If you make a report in good faith then, even if it is not confirmed by an investigation, your concern will be valued and you will not be penalised in any way.

As you would expect, deliberately making a false report – maliciously or for personal gain – will lead to disciplinary action.

How do I make a report?

The simplest and quickest way is to use the established confidential hotline number – 01908 544163. This is a 24 hour answerphone service and allows you to report your concerns anonymously. Alternatively you may wish to speak to your Line Manager or a member of the Human Resources / Audit Department or write to the Human Resources Department in Milton Keynes.

Will my identity be protected?

If you reveal your identity to us, we will do everything possible to keep it secret if you so desire. In certain circumstances – for instance, if your report becomes the subject of a criminal investigation – you may be needed as a witness. Should this be the case, we will discuss the matter with you at the earliest opportunity.

How will my report be investigated?

We will need to make preliminary enquiries to decide whether a full investigation is necessary. If such an investigation is necessary, your concerns will either be followed up by the appropriate Department (such as Security, Human Resources, IT, Operations, Licensing), or referred to the appropriate external person (for example, Police).

Do I need proof of wrongdoing?

Whilst we do not expect you to have absolute proof of any misconduct or malpractice that you report, you will need to demonstrate valid reasons for your concern. We will assume that reports are made in good faith.

What can I do if I am unhappy with the way my report is dealt with?

If you are unhappy with the outcome of an investigation, we will ask you to submit another report explaining why this is the case. Your concern will be investigated again if there is good reason to do so.