



PUBLIC INTEREST DISCLOSURE POLICY

SCCU LIMITED

VERSION 3.0

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Version Control

VERSION	REVIEWER NAME	DATE	NEXT REVIEW	COMMENTS
3.0	Liam Morrissey	August 2021	01/08/2022	Update to previous.

Introduction

1. SCCU are committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards however, all organisations face risks of disclosure or wrongdoing.
2. A culture of openness and accountability is essential to prevent such situations from occurring and to address them when they do occur.
3. We wish 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.
4. This policy has been written to provide staff with guidance as to how to raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken.

Scope

5. This policy covers all employees, officers, consultants, contractors, and other workers employed or engaged by SCCU who will be referred to as 'staff' throughout.
6. This policy does not form part of any contract of employment or service contract and we may amend it any time.
7. The act of making a public interest disclosure is also referred to as 'whistleblowing' or 'blowing the whistle'.

Responsibilities

8. The Whistleblowing Officer has day-to-day operational responsibility for this policy and will ensure that all managers and other staff who may deal with concerns or investigations under this policy receive regular and appropriate training.
9. All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing.
10. 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?

11. Whistleblowing is the disclosure of information, usually by a worker that relates to suspected wrongdoing, usually at their workplace (but not always, see External Disclosure section) which normally in the public interest.
12. This may include:
 - Criminal activity;
 - Failure to comply with any legal or professional obligation or regulatory requirements;
 - Miscarriages of justice;
 - Danger to health and safety;
 - Damage to the environment;
 - Bribery;
 - Financial fraud or mismanagement;
 - Negligence;
 - Breach of our internal policies and procedures;
 - Conduct likely to damage our reputation;
 - Unauthorised disclosure of confidential information; and
 - The deliberate concealment of any of the above matters.
13. 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.
14. As a whistleblower you're protected by law and should not be treated unfairly or lose your job because you 'blow the whistle'.
15. This policy should not be used for complaints relating to your circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Procedure or our Harassment and Bullying Policy as appropriate.
16. 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

17. It is preferable that staff report concerns to SCCU in the first instance.
18. 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.
19. They may be able to agree on a way of resolving your concern quickly and effectively.
20. In some cases, they may refer the matter to the Whistleblowing Officer on your behalf.
21. Alternatively, you can raise the matter with the Whistleblowing Officer directly if the matter relates to you line manager, may be widespread or is of a particularly serious nature.
22. We will arrange a meeting with you as soon as possible to discuss your concern.
23. You have a legal right to be accompanied by a colleague or union representative to any meetings under this policy.
24. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.
25. We will take down a written summary of your concern and provide you with a copy after the meeting.
26. We will also aim to give you an indication of how we propose to deal with the matter.

Confidentiality

27. 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.
28. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.
29. We do not encourage staff to make disclosures 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.
30. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowing Officer and appropriate measures can then be taken to preserve confidentiality.

31. If you are in any doubt, you can seek advice from Public Concern at Work, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.
32. Staff who speak to the media will usually lose their right to confidentiality.

Investigation and Outcome

33. Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation and will inform you of the outcome of our assessment where practicable.
34. You may be required to attend additional meetings to provide further information.
35. 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.
36. 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.
37. You must treat any information about the investigation as confidential.
38. If we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, they will normally lose their rights under the Public Interest Disclosure Act 1998 and such behaviour will be treated as gross misconduct and could lead to disciplinary action being taken (which could include summary dismissal).

If You are Not Satisfied

39. 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.
40. If you are not happy with how your concern has been handled, you can raise it with the Chairman. Contact details are set out at the end of this policy.

External Disclosures

41. SCCU 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.
42. 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.
43. We strongly encourage you to seek advice before reporting a concern to anyone external.
44. 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 concerns. Their contact details are at the end of this policy.
45. 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.
46. 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 the Whistleblowing Officer for guidance.
47. If we conclude that an external whistleblower has made false allegations maliciously or with a view to personal gain, these individuals will be pursued with legal action.

Protection and Support for Whistleblowers

48. Understandably, whistleblowers are sometimes worried about possible repercussions, however we aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.
49. Whistleblowers must not suffer any detrimental treatment as a result of raising a concern in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.
50. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer immediately.
51. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

52. You must not threaten or retaliate against whistleblowers in any way.

53. If you are involved in such conduct, you may be subject to disciplinary action, which may lead to your summary dismissal and in some cases, the whistleblower could have a right to sue you personally for compensation in an employment tribunal.

Contacts

Whistleblowing Officer: James Pease | jpease@sccu.uk.com | (024) 7693 6969

Public Concern at Work

(Independent Whistleblowing Charity) | Helpline: (020) 7404 6609

whistle@pcaw.co.uk | <http://www.pcaw.co.uk>