

WHISTLEBLOWING POLICY

1. INTRODUCTION

- a) We are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.
- b) Under certain circumstances, employees are protected from suffering any detriment or termination of employment if they make disclosures about organisations for whom they work.
- c) This policy covers all employees, officers, consultants, contractors, casual workers and agency workers.
- d) This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. WHAT IS WHISTLEBLOWING?

- a) Whistleblowing is the reporting of suspected wrongdoing or dangers. This includes bribery, facilitation of tax evasion, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment, sexual harassment and any breach of legal or professional obligations.

3. QUALIFYING DISCLOSURES

- b) Certain disclosures are prescribed by law as qualifying disclosures. A qualifying disclosure means a disclosure of information that the employee genuinely and reasonably believes is in the public interest and shows that NJC has committed a relevant failure by:
 - i. committing a criminal offence;
 - ii. failing to comply with a legal obligation;
 - iii. a miscarriage of justice;
 - iv. endangering the health and safety of an individual;
 - v. sexual harassment;
 - vi. environmental damage; or
 - vii. concealing any information relating to the above.

- c) 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. NJC will take any concerns that you may raise relating to the above matters very seriously.
- d) We encourage you to use the procedure if you are concerned about any wrong doing at work. However, if the procedure has been invoked for malicious reasons or in pursuit of a personal grudge, then this may result in disciplinary action being taken, which could result in the termination of your employment or such lesser disciplinary sanction as may be appropriate in the circumstances.

4. THE PROCEDURE: RAISING A CONCERN

- a) We hope that in many cases you will be able to raise any concerns with your manager. However, where you prefer not to raise it with your manager for any reason, you should contact a Director. We hope that staff will feel able to voice concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.
- b) 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.
- c) We hope that staff will feel able to voice concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern. Disclosures of this nature can be made via email to speakup@njcdna.com run by the People and Culture team. We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative (if you are a member of a trade union) to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.
- d) While we hope that you will not feel it necessary to report concerns externally, the law recognises that in some circumstances, this may be appropriate. We strongly encourage you to seek advice before reporting a concern to anyone external. Public Concern at Work operates a confidential helpline (020 7404 6609) and you can also email them at whistle@pcaw.co.uk. For further information, please visit their website at www.pcaw.co.uk

5. TREATMENT BY OTHERS

- a) We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.
- b) Bullying, harassment, victimisation or any other detrimental treatment afforded

to a colleague who has made a qualifying disclosure is unacceptable. Anyone found to have acted in such a manner will be subject to disciplinary action.

- c) However, if we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

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