

## **WHISTLEBLOWING POLICY**

### **Purpose**

The purpose of this Policy and Procedure is to provide a clear framework for dealing with issues relating to serious concerns employees' may have about the Company's work and to come forward and voice those concerns. This also applies to concerns about the activities of staff and external organisations in their dealings with the Company. This policy:

- provides the basis on which employees can raise any such concerns they may have, and receive feedback on action taken,
- allows employees to take the matter further if they are dissatisfied with the company's response, and
- gives protection from reprisals or victimisation for 'whistleblowing' in good faith.

### **Policy**

There are existing procedures in place to enable employees to raise grievances about their own employment. This policy is intended to cover concerns that fall outside the scope of individual grievances. The concern(s) may be about something that:

- Is unlawful;
- Is against the Company Policies;
- Amounts to improper conduct;
- Seems likely to harm a member of the public or the environment; or
- Represents a cover-up of these sorts of issues

### **Safeguards**

#### **Harassment or victimisation**

The Company recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisals from those responsible for the malpractice.

The Company will not tolerate harassment or victimisation and will take all possible measures to protect employees who raise concerns in good faith.

#### **Confidentiality**

The Company will protect the identity of employees who raise concerns and do not want their name to be disclosed. It must be appreciated, however, that the investigation may

reveal the source of the information, and statements made by the employees who raised the issue may be required as part of the evidence.

The Company encourages employees to put their name to allegations made. Concerns expressed anonymously are much less powerful, but they will be considered at the discretion of the Company. In exercising this discretion, the factors to be taken account of will include:

- the seriousness of the issue raised,
- the credibility of the concern, and
- the likelihood of confirming the allegation from attributable sources.
- untrue allegations

If an allegation is made in good faith, but is not confirmed by the investigation, no action will be taken against the employee. However, if employees make allegations that are malicious or vexatious, disciplinary action against them may be likely.

## **Procedure**

### **Raising a concern**

The earlier employees express their concern the easier it is to take action. As a first step, employees should normally raise concerns with the Line Manager. This will depend on the nature of their concern. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. Employees who feel that they cannot approach management in their own Hotel should approach either:

- General Manager at another Hotel
- Trade Union or Professional Association (for advice)

Concerns are better raised in writing to [tellus@4cgroup.co.uk](mailto:tellus@4cgroup.co.uk) This should set out the background and history of the concern, giving names, dates and places where possible, and the reason why the employee is concerned about the situation. Employees who do not feel able to put their concerns in writing can telephone or meet the appropriate person. Employees may invite their trade union or professional association to raise the matter in conjunction with them.

### **Company's Response**

The action taken by the Company will depend on the nature of the concern. The matters raised may for example:

- be investigated internally,
- be referred to the Police,
- be referred to the External Auditor, or

- form the subject of an independent inquiry

In order to protect individuals and the Company, initial enquiries will be made to decide whether an investigation is appropriate and if so, what form it should take. Concerns or allegations which fall within the scope of specific procedures (for example, unlawful discrimination issues) will normally be referred for consideration under those procedures. Some concerns may be resolved by agreed action without the need for investigation.

Within 5 working days of a concern being received, an appropriate nominated person will write to the employee who raised the issue:

- acknowledging that the concern has been raised,
- indicating how it is proposed to deal with the matter,
- where possible, giving an estimate of how long it will take to provide a final response, and
- telling the employee whether further investigations will take place, and if not, why not.

The amount of contact between those considering the issue and the employee who has raised the issue will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought from the employee.

When any meeting is arranged with the employee, he or she will be given the right to be accompanied by a Union or professional association representative or a work colleague who is not involved in the area of work to which the concern relates.

The Company accepts that employees need to be assured that the matter has been properly addressed. Therefore, subject to legal or contractual constraints, employees will receive information about the outcomes of any investigations.

### **Not satisfied with the action?**

The policy is intended to provide employees with an avenue to raise relevant concerns within the Company. It is hoped that employees will be satisfied with the action taken as a result. If employees are not satisfied, and feel it is right to take the matter outside the Company, the following are possible contact points, some or all of which may be appropriate:

- The local member of parliament
- National Audit Office
- Health and Safety Executive
- Relevant professional bodies or regulatory organisations
- The Police
- The charity Public Concern at Work (telephone 020 7404 6609)

If employees do take the matter outside of the Company, they must ensure that they do not disclose otherwise confidential information.

**Review of Procedure**

This procedure shall be subject to periodic review and may be changed from time to time.