



## Glen Group Limited

### WHISTLEBLOWING POLICY

Whistle blowing occurs when an employee raises a concern about a danger or illegality that affects others. Employees may be concerned that to raise the issue through the normal course, may not protect them, but at Glen Group we encourage any employee to voice their concerns over malpractice and act against any employee who would try to hinder them doing so.

We would encourage any employee to raise any issue internally on:

- ❖ Criminal offences
- ❖ Breaches of legal obligations including negligence and or breach of contract
- ❖ Miscarriages of justice
- ❖ Health and Safety
- ❖ Damage to the environment
- ❖ The concealment of any of the above.
- ❖ Modern Slavery
- ❖ Safeguarding

#### Confidentiality

All contacts will be treated confidentially and will be investigated; however because of the nature of the investigation or disclosure, it may be necessary to disclose your identity. This will be in connection with any associated disciplinary or legal investigations or proceedings. All reasonable steps will be taken to protect you from any detriment.

Anonymous disclosures are very difficult to act upon as there may be little or no corroborative evidence to substantiate the allegation. Proper investigations may prove difficult if the investigator cannot obtain further information. **We do not encourage anonymous reporting but would encourage individuals to come forward with their concerns.**

Remember that if you do not tell us who you are, it will be much more difficult for us to look into the matter or to protect your position or to give you feedback. **Accordingly, while we will consider anonymous reports, this policy is not appropriate for concerns raised anonymously.**

#### Whistle Blowing Process

We encourage you to raise the issue in the first instance with your manager. However, if you feel this is not appropriate an alternative route directly to the Glen Group Board is available, you may do this by contacting either verbally or in writing:

Ross Barnes , Managing Director Telephone; 07775935182 or email:

[rossbarnes@glengroupltd.com](mailto:rossbarnes@glengroupltd.com)

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Alan North	Kim Stevens	Ross Barnes	March 2023
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You should state whether you wish your identity to be kept confidential and that you are using the Whistle blowing Policy.

### **How the Disclosure will be Handled**

- ❖ The procedure is not intended to replace the Grievance Procedure, which should be used to raise personal issues, specific to your job or employment.
- ❖ Your disclosure under the Whistle Blowing Policy will be acknowledged in writing confirming how the matter will be investigated.
- ❖ A suitable person will be delegated to investigate and will make recommendations to the Board on action
- ❖ The length and scope of the investigation will be dependent on the allegation
- ❖ You may be required to give further information as necessary
- ❖ You will receive written notification of the outcome or /and a copy of the investigation report
- ❖ If you are not satisfied by the response you may raise your concerns to the Managing Director.

### **Corrective Action or Change**

As part of the investigation any recommendations made will be reviewed with our current policies to minimise any risk of reoccurrence.

### **Support for Whistle blowers**

The whistle blower will not be disadvantaged; if they have acted in good faith and their employment status will not be affected, even if their concerns be proven unfounded at a later date.

### **False Disclosures**

Glen Group view false complaints very seriously. We will take disciplinary action against an individual who deliberately or maliciously raises a false concern to bring the business or individuals into disrepute and consider these if proven to constitute gross misconduct which will result in dismissal.

MD Glen Group Limited

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