

## IMMAF WHISTLEBLOWING POLICY

### Purpose and scope

We are committed to creating and maintaining a culture of openness within our organisation so that individuals feel encouraged and confident to raise any concerns relating to suspected misconduct at an early stage.

We also recognise the negative effect which malpractice can have on the organisation, and therefore encourage individuals to raise genuine concerns, or any suspicions concerning misconduct.

This Policy is intended to cover concerns that are made in the public interest. If the matter is of an individual or personal nature it should be pursued through the Grievance Procedure. Complaints relating to discrimination, victimisation or harassment should be dealt with through the Grievance Procedure and Harassment Policy.

This Policy applies to full and part-time representatives, workers, and contractors, home workers and agency workers.

This Policy is non-contractual and may be amended by us at any time.

This Policy is available to all employees and representatives.

### Complaints that count as whistleblowing

Complaints that count as whistleblowing are of public interest, as follows, and you are protected under UK law for such complaints:

- a criminal offence, e.g. fraud
- someone's health and safety is in danger
- risk or actual damage to the environment
- a miscarriage of justice
- the company is breaking the law, e.g. doesn't have the right insurance
- you believe someone is covering up wrongdoing

- Complaints that don't count as whistleblowing

Personal grievances (e.g. bullying, harassment, discrimination) aren't covered by whistleblowing law, unless your particular case is in the public interest.

### **Protection**

We appreciate that those reporting concerns may be apprehensive. We want to reassure you that you will suffer no detrimental treatment as a result of voicing your concerns.

We will not tolerate victimisation, harassment, bullying or any other detrimental treatment of any worker who has made a disclosure under this Policy. Complaints about such behaviour will be dealt with under the Disciplinary Procedure.

You are encouraged to report suspected wrongdoing as soon as possible. No action will be taken against you if you raise genuine concerns, even if the concern you raised is not confirmed by any subsequent investigation.

### **Confidentiality and anonymity**

Any disclosure you make under this Policy will be treated as far as reasonably practicable in a confidential and sensitive manner. If confidentiality is not reasonably practicable, for instance, because of the nature of the information, this will be explained to you.

We hope you will feel comfortable to voice any concerns openly, however, you may make a disclosure anonymously. However, concerns expressed anonymously cannot be dealt with as effectively as open disclosures as they are often more difficult to investigate.

### **How to make a disclosure**

In the first instance you should bring the matter to the attention of your immediate manager, who will inform CEO. If the disclosure contains allegations about your immediate manager or the malpractice occurs at this level, you may make the disclosure directly to the CEO.

If your disclosure concerns a very serious allegation the Board will be notified.

### **Investigation**

Once a concern has been raised, we will investigate this. If you have not made the complaint anonymously, you will be asked to attend a meeting as part of this investigation.

We will keep you informed as to the progress of the investigation, as far as is possible and appropriate bearing in mind, in particular, any confidentiality obligations that apply. Please note that you will not be given details of any disciplinary action taken unless we consider this appropriate.

### **Dissatisfaction with the outcome of the process**

If you are dissatisfied with the outcome of the investigation, you should raise this with the President / directly to the Board giving the reasons for your dissatisfaction.

He/she will respond in writing notifying you of his/her acceptance or rejection of the need for further investigation and the reasons for this.

### **Breach of this Policy**

We may invoke the Disciplinary Procedure if you are found to have subjected a whistle-blower to any form of detrimental treatment. It may also be invoked if you have intentionally misled us in respect of any matter, breached this Policy in any other way and/or if we believe that you have made a false allegation maliciously.