

'Whistleblowing' and Public Interest Disclosure Policy

1. We strive at all times to conduct our activities with the highest standards of integrity and honesty. It is therefore expected that all employees maintain the highest standards in these areas in all of their work decisions and performance. Employees are therefore encouraged to report any wrongdoing or actions by employees that fall short of these business principles.
2. Certain disclosures are prescribed by law as "qualifying disclosures". A "qualifying disclosure" means a disclosure of information that the employee genuinely and reasonably believes that one or more of the following matters is either happening, is likely to happen the future or has taken place:
 - a criminal offence has been committed, is being committed or is likely to be committed
 - a person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject
 - a miscarriage of justice has occurred, is occurring or is likely to occur
 - the health and safety of any individual has been, is being or is likely to be endangered
 - the environment has been, is being or is likely to be damaged
 - information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.
3. There is no need for an employee to prove that the breach or failure that they are alleging has occurred or is likely to occur. A reasonable suspicion will suffice, i.e. where the employee reasonably believes that the information disclosed is substantially true.
4. We recognise that employees may not always feel comfortable about discussing their concerns internally, especially if they believe that the Company itself is responsible for the wrongdoing. The aim of this policy is to ensure that employees are confident that they can raise any matter that concerns them in the knowledge that it will be taken seriously, treated as confidential and that no action will be taken against them.
5. Employees are encouraged to discuss with their manager in the first instance. Any disclosure will be treated as completely confidential.
6. If you feel that it would not be appropriate to raise the issue with your manager, then you should contact a Director or the leadership team who will confirm who you should put your concerns in writing to.
7. If you feel that it would not be appropriate to raise the issue with the company, you should take them directly to the appropriate organisation or body. A list of prescribed people and bodies can be found on the gov.uk website.

8. All issues, concerns, reports and disclosures made in writing to the Company under this policy will be logged and retained on file by the Company for a minimum of 12 months, and thereafter as long as is reasonably necessary, in order to adhere to our obligations as a Company and take corrective actions to prevent a similar issue from arising again in future.
9. We will arrange a meeting with you as soon as possible to discuss your concerns after you have raised them with us. You will have the opportunity to be accompanied at the meeting by a fellow employee or a Trade Union representative or official should you so wish. We will aim to give you an indication of how we propose to deal with the matter as soon as possible, if it is appropriate to do so and the likely timescale. We will endeavour to respond to any issues raised within a reasonable timeframe.
10. Employees have a duty to make all reasonable attempts to attend any meeting arranged. Failure to attend without good reason may be treated as misconduct in itself. If you fail to attend without good reason, or are persistently unable to do so, we may have to take a decision based on the available evidence in your absence.
11. You have the right to call any witnesses to the meeting who are relevant. You should let the manager responsible for the hearing know the name of your chosen witnesses in advance of the hearing in good time.
12. In order to protect both the employee and the Company, initial enquires 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, e.g., Equality, Diversity & Dignity at Work, Grievance etc, will normally be referred for consideration under those procedures. If your concern relates to your own treatment as an employee, you should raise it under the existing grievance or harassment procedures.
13. If the matter requires further investigation, such an investigation will be carried out. This may of course involve meetings with the employee and others which we encourage in order to assist any investigations. You should treat any information about any necessary investigations as strictly confidential. 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 giving you specific details of the investigation or any action taken as a result.
14. The Company reserves the right to outsource the procedure to a suitably qualified third party. In such an event, the Company gives full authority for the appointed third party to manage the process and arrive at a decision or overturn any decision made previously should the evidence support the decision.
15. We reserve the right to report, as appropriate, any concern to the police or any appropriate industry, regulatory or professional body.
16. If the employee is unhappy about the speed or conduct of the investigation or the way in which the matter has been resolved, this should be declared in writing and the matter will be referred to another appropriate senior member of staff. When the complaint has been investigated, the employee will be informed of the result and what, if any, action has been taken.
17. We undertake to ensure that no employee who makes a bona fide report under this policy will be subjected to any detriment, bullying or harassment from another employee. In the event that an employee believes they are being subjected to a detriment by any person within our employment as a result of their decision to invoke the policy, the employee must inform an appropriate person immediately and appropriate action will be taken.

- 18. The disclosure is not protected unless the employee reasonably believes that the disclosure is made in the public interest.

- 19. If it should become clear that the policy has not been invoked by the employee as outlined above, for example, for malicious reasons or to pursue a personal grudge against another employee or the Company, this will be dealt with in accordance with the disciplinary procedure and may in serious cases lead to the termination of employment.

Monitoring and review

We will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy, and effectiveness. Any improvements identified will be made as soon as possible. The Practice may request any associated party to confirm compliance with this policy on an annual basis.

Questions

If have any other queries relating to this policy, please feel free to discuss with your Line Manager, Practice Manager, or the Director in Charge.

Director in ChargeMatthew Moreton

Practice ManagerMarie Moreton

Date: 29th April 2025