



Whistleblowing Policy

Date Created	Created By	Next Review Date
July 2018	Liz Moran	October 2021

Exec Sign Off (if applicable)	Name: Alison Hughes, HR Manager	Signature: 	Date: October 2020
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Definition

Whistleblowing is the name given to the act of the disclosure of information to the employer or the relevant authority by an individual who knows, or suspects, that the Company is responsible for or taken part in some wrongdoing.

Those making qualifying disclosures are protected against dismissal or detriment by The Public Interest Disclosure Act 1998.

Procedure

The Whistleblowing Procedure sets out the framework for dealing with allegations of illegal and improper conduct.

System Group is committed to the highest standards of transparency, probity, integrity and accountability. This procedure is intended to provide a means of making serious allegations about standards, conduct, financial irregularity or possible unlawful action in a way that will ensure confidentiality and protect those making such allegations in the reasonable belief that it is in the public interest to do so from being victimised, discriminated against or disadvantaged.

This procedure does not replace other policies and procedures such as the Complaints Procedure, the Grievance and Harassment and Bullying Policies and other specifically laid down statutory reporting procedures.

This procedure is intended to ensure that System Group complies with its duty under the Public Interest Disclosure Act 1998.

Scope

This procedure applies to all System Group employees, including Associates and contractors.

This procedure applies to, but is not limited to, allegations about any of the following:

- Conduct which is an offence or breach of the law
- Alleged miscarriage of justice
- Serious Health and Safety risks
- The unauthorised use of public funds
- Possible fraud and corruption
- Sexual, physical or verbal abuse, or bullying or intimidation of employees, customers or service users
- Abuse of authority
- Other unethical conduct

Reporting

Contact Details for Reporting: (in writing):

Alison Hughes HR Manager		Paul Hudson CEO
System Group Business First, Unit A Unit 122-124 25 Goodlass Road Speke Liverpool L24 9HJ	Or	System Group Business First, Unit A Unit 122-124 25 Goodlass Road Speke Liverpool L24 9HJ
<p>Alternatively, if you feel unable to disclose the allegations to the HR Manager or CEO, please contact System Group's Chairman, Andrew Littlejohns in writing at the following address:</p> <p style="text-align: center;">Andrew Littlejohns – System Group Chairman Rcapital Partners LLP 5th Floor, 24 Old Bond Street Mayfair London W1S 4AW</p>		

System Group recognises that the decision to make an allegation can be a difficult one to make and will take appropriate action to protect a whistleblower who makes a serious allegation in the reasonable belief that it is in the public interest to do so from any reprisals, harassment or victimisation.

Bullying, harassment 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 matter will be subject to disciplinary action.

Confidentiality

All allegations will be treated in confidence and every effort will be made not to reveal a whistleblower's identity unless the whistleblower otherwise requests. If the allegation results in court proceedings then the whistleblower may have to give evidence in open court if the case is to be successful.

System Group will not, without the whistleblower's consent, disclose the identity of a whistleblower to anyone other than a person involved in the investigation/allegation.

Anonymous Allegations

This procedure encourages whistleblowers to put their name to an allegation wherever possible as anonymous allegations may often be difficult to substantiate/prove.

In exercising discretion to accept an anonymous allegation the factors to be taken into account:

- The seriousness of the issue raised
- The credibility of the allegation; and
- Whether the allegation can realistically be investigated from factors or sources other than the complainant

Untrue Allegations

No disciplinary or other action will be taken against a whistleblower who makes an allegation in the reasonable belief that it is in the public interest to do so even if the allegation is not substantiated by an investigation. However, disciplinary action may be taken against a whistleblower who makes an allegation without reasonable belief that it is in the public interest to do so (eg making an allegation frivolously, maliciously or for personal gain where there is no element of public interest).

Procedure for Making an Allegation

Allegations should be made to an employee's line manager, however, this may depend on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. If the whistleblower believes that management is involved, then an allegation should be directed to any of the following:

- The CEO
- HR Manager
- System Group Chairman

If either of the above receive an allegation he/she will consider the allegation and may discuss with either the CEO or the Board. The line manager (or either/or both) of the above, after consideration, will discuss with the whistleblower and if they wish to proceed with the allegation will be investigated.

Allegation

The following information is to be provided:

- The name of the person making the allegation and a contact point.

- The background and history of the allegation (giving relevant dates and names and positions of those who may be in a position to have contributed to the allegation);
- The specific reason for the allegation. Although someone making an allegation will not be expected to prove the truth of any allegations, they will need to provide information to the person they have reported to, to establish that there are reasonable grounds for the allegation.

Someone making an allegation may be accompanied by another person of their choosing during any meetings or interviews in connection with the allegation. However, if the matter is subsequently dealt with through another procedure the right to be accompanied will at that stage be in accordance with the relevant procedure.

Action on Receipt of an Allegation

The line manager will record details of the allegation gathering as much information as possible, (within 5 working days of receipt of the allegation) including:

- The record of the allegation;
- The acknowledgement of the allegation;
- Any documents supplied by the whistleblower

The investigator will ask the whistleblower for his/her preferred means of communication and contact details and use these for all communications with the whistleblower, in order to preserve confidentiality.

If the allegation relates to fraud, potential fraud or other financial irregularity the Board will be informed within 5 working days of receipt of the allegation. The Board will determine whether the allegation should be investigated and the method of investigation. If the allegation discloses evidence of a criminal offence it will immediately be reported to the Board and a decision will be made as to whether to inform the Police. If the issue is around suspected harm to vulnerable adults, Safeguarding Policies should be referred to.

Timetable

- An acknowledge the allegation in writing within 10 working days with
 - An indication of how System Group propose to deal with the matter
 - An estimate of how long it will take to provide a final response
 - An indication of whether any initial enquiries have been made
 - Information on whistleblower support mechanisms
 - Indication whether further investigations will take place and if not, why not

Where the allegation has been made internally and anonymously, System Group are unable to communicate what action has been taken.

Support

System Group will take steps to minimise any difficulties which may be experienced as a result of making an allegation and accepts that whistleblowers need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform those making allegations of the outcome of any investigation.

Responsibility for the Procedure

The CEO and HR Manager have overall responsibility for the operation of this Procedure and for determining the administrative processes to be followed and the format of the records to be kept.

Monitoring

A Register will record the following details:

- The name and status (e.g. employee) of the whistleblower
- The date on which the allegation was received
- The nature of the allegation
- Details of the person who received the allegation
- Whether the allegation is to be investigated and, if yes, by whom
- The outcome of the investigation
- Any other relevant details

The Register will be confidential and only available for inspection by the Board.

The CEO will report annually to the Board on the operation of the Procedure and on the whistleblowing allegations made during the period covered by the report. The report will be in a form which does not identify whistleblowers.