

# Fidra Energy Whistleblowing Policy

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## 1. Summary

This document details the HR Policy: Whistleblowing Policy and Procedure.

## 2. Introduction

Whistleblowing is one of the most effective ways of preventing and eliminating wrongdoing at work.

We recognise that raising a whistleblowing concern can be daunting. However, we encourage you to report concerns internally as soon as possible where you suspect wrongdoing. We are here to listen and will take all concerns that you raise seriously.

This policy sets out the procedure for raising a whistleblowing concern and the support and protection that is available to you when you do so.

If your concern relates to a personal grievance that is not in the public interest (for example, an allegation of bullying or harassment, or an allegation that your contract of employment has been breached), you should raise it under our separate grievance procedure.

If you are unsure about whether your concerns are best dealt with under the whistleblowing policy or grievance procedure, please speak to the HR department for further advice.

This policy does not form part of your contract of employment, and we reserve the right to amend or withdraw it at any time.

## 3. Scope

This policy applies to all employees and workers employed by us. Other individuals, including our contractors, subcontractors, suppliers and volunteers are also encouraged to follow the procedure set out in this policy.

### **Whistleblowing concerns to which this policy relates**

Whistleblowing is the act of reporting suspected wrongdoing or risk of wrongdoing relating to:

- a criminal offence;
- a failure to comply with a legal obligation;
- a miscarriage of justice;
- a risk to the health and safety of an individual;
- damage to the environment; or
- an attempt to cover up any of the above.

It is not necessary for you to prove the wrongdoing. However, to be protected by whistleblowing laws against detrimental treatment or dismissal, you must reasonably believe that wrongdoing (related to one of the categories listed above) is being, has been, or is likely to be committed and that your disclosure is in the public interest.

## 4. Procedure

### **Stage 1 - Raising a whistleblowing concern**

If you have a genuine concern relating to any type of wrongdoing that is covered under this policy, you should raise it with your line manager. If your concern relates to your line manager, or for any reason you do not wish to approach your line manager, you should raise your concern with the HR department.

You should raise your concern in writing. It is important that you set out clearly:

- the details of the suspected wrongdoing;
- the names of any individuals involved; and
- and what action (if any) you are seeking.

In some cases, it may be necessary to ask you to attend a meeting to clarify the nature of your concern. This will be arranged as soon as possible. You may, if you wish, bring a colleague or a trade union representative with you to the meeting. Where it is considered appropriate, a member of the HR department may also be present.

## **Stage 2 - Responding to your whistleblowing concern**

The manager to whom you raise your concern will decide if an investigation is required and, if it is, the most appropriate person to conduct it. The relevant manager will write to you confirming that they are conducting an investigation and the timescale for completion.

The level of investigation and time this will take will vary depending on the nature of the suspected wrongdoing.

Following the investigation, the relevant manager will inform you in writing, as quickly as possible after completion of the investigation, of the outcome and any next steps or action that will be taken. While we aim to provide you with comprehensive feedback, in some cases this may not be possible, for example where data protection rules apply or there are sensitive issues that need to remain confidential.

## **Stage 3 - Appeal**

If you are not satisfied with how your concern has been dealt with, you should appeal to the HR department.

You should raise your appeal in writing. It is important that you set out clearly the grounds of your appeal, i.e. the basis on which you consider that your original concern has not been satisfactorily dealt with.

In some cases, it may be necessary to ask you to attend a meeting to clarify the nature of your appeal. This will be arranged as soon as possible. You may, if you wish, bring a colleague or a trade union representative with you to the meeting. Where it is considered appropriate, a member of the HR department may also be present.

The relevant manager will consider your grounds for appeal and review the manner in which your original whistleblowing concern was handled. You will be informed in writing of the outcome as quickly as possible.

## **Confidentiality and anonymity**

We want you to feel comfortable about raising a whistleblowing concern openly and actively encourage you to do so.

Where you raise a whistleblowing concern openly, we will maintain your confidentiality as far as possible. If we need to identify your identity to anyone, we will notify you beforehand.

In the alternative, you may decide to raise a whistleblowing concern anonymously via our independent external reporting route Safecall, please see contact details below:

Telephone - 0800 915 1571

Online – [www.safecall.co.uk/report](http://www.safecall.co.uk/report)

All calls to Safecall are treated confidentially.

We encourage anonymous reporting over remaining silent. Although we will investigate any concern that is reported anonymously as best, we can, an anonymous report is likely to be more difficult for us to investigate and we will not be in a position to provide you with any feedback.

### **Our commitment to you**

You have the right not to be subjected to any detrimental treatment (including being unfairly penalised, disciplined or dismissed) because you have raised a whistleblowing concern.

If you raise a whistleblowing concern in accordance with this policy, we will ensure that you are treated with respect and provided with adequate support and protection.

If you are told not to raise or pursue a whistleblowing concern, or you believe that you have been subjected to detrimental treatment because you have raised a whistleblowing concern, you should report the matter to the HR department. In the alternative, you can raise it under our Grievance Procedure if it applies to you.

Any such behaviour will not be tolerated and will be treated as a disciplinary offence.

If we find that an individual has knowingly raised false allegations, this will also be treated as a disciplinary offence.

### **Raising your whistleblowing concerns externally**

We encourage you to raise your whistleblowing concerns internally in the first instance. If you feel that appropriate action has not been taken, you should report the matter to the correct prescribed body or person (see list on GOV.UK).

You should seek advice if you are thinking of raising your concern with the media as you will not have protection under whistleblowing laws unless certain conditions are met.

## **5. Responsibilities**

<b>Role</b>	<b>Responsibility</b>
HR Director	<p>Owns the Whistleblowing Policy and is responsible for obtaining agreement to the procedure from the Chief Executive Officer.</p> <p>Responsible for maintaining the HR policy and procedure, ensuring that they are regularly reviewed and proposing any changes.</p> <p>Manage the contract for the external reporting arrangement via Safecall.</p> <p>Responsible for ensuring the procedure is implemented and communicated appropriately.</p> <p>Responsible for supporting managers in applying this HR Policy and procedure.</p>
Executive Team	<p>Responsible for ensuring the procedure is implemented and communicated appropriately within their respective business areas.</p>

Human Resources	Responsible for providing advice and support to managers and monitoring consistency of application of the HR procedure across the Company.  Responsible for ensuring that, where relevant, the personnel information system is updated.
Managers being advised of a concern	Responsible for arranging for the concern to be assessed, arranging for an investigation to take place where appropriate and for determining next steps.  Responsible for ensuring that the requirements of this HR Policy and the relevant procedures are followed.
Employees	Responsible for raising concerns in accordance with this procedure.

## 6. Records

Where serious concerns are reported internally, the person to whom the report is made will retain a confidential record of the concern and how it was dealt with.

For reports that are made via the external reporting arrangement via Safecall, Human Resources will retain confidential records.

Personal data will be retained in accordance with the Data Protection Act. Further information can be found in our privacy notices.

### Data protection

We process any personal data collected during the whistleblowing procedure in accordance with our data protection policy. Any data collected is held securely and accessed by, and disclosed to, individuals only for the purposes of completing the whistleblowing procedure. Inappropriate access or disclosure of employee data constitutes a data breach and should be reported in accordance with our data protection policy immediately. It may also constitute a disciplinary offence, which will be dealt with under our disciplinary procedure.

## Document History

Version	Date	Author	Comments
Version 1.0	01.08.2024	HR	FE Procedure Developed