

## Whistleblowing Policy

### Purpose

The purpose of this policy is to guide staff in relation to Whistleblowing in accordance with the Public Interest Disclosure Act 1998, otherwise known as the 'Whistleblowers Act' and to make it clear what employees should do to disclose any concerns about the alleged wrongful conduct of the employer, employee, client, or any third party.

Whistleblowing is when an individual raises a concern about any suspected illegal wrongdoing or dangers at work. Officially this is called 'making a disclosure in the public interest'.

You can report things that are not right, are illegal or if you are concerned that anyone at work is neglecting their duties including:

- health and safety dangers
- damage to the environment
- any criminal offence
- anything illegal
- any wrongdoing that is being covered up

It is MJCA's policy to conduct all of our business in an honest, professional and ethical manner.

### Policy statement

This Whistleblowing policy is in place to encourage employees to confide in someone without fear of reprisal if they have concerns about any malpractice or wrongdoing at MJCA.

When dealing with situations under this policy we will aim to ensure that individuals feel that they have been treated fairly and consistently regardless of the outcome.

### Protection

MJCA will support anyone who raises genuine concerns in good faith under this policy even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment. *(which includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern)* as a result of disclosing any concerns.

If you believe that you have suffered any detrimental treatment as a result of making a report then you should inform the HR Department immediately.

### Procedure

Please provide written details of your concerns and address it for the attention of your preferred manager. You will need to provide details of any evidence that you have and state that you are raising a concern under the Whistleblowers Act. This will ensure clarity of your concerns and allow MJCA to undertake a full investigation and make an appropriate response.

Please note that if you are asked to describe the issue verbally to a member of the management team you are entitled to have another employee to attend the meeting with you if you wish to do so.

MJCA will investigate concerns expressed anonymously.

Following a meeting the manager and you may agree that the discussion has resolved the issue but if not the manager will undertake further investigations and implement an action plan to proceed with the concerns that have been raised.

MJCA will only request permission to reveal your identity if investigation indicates it is essential or if MJCA are required to provide evidence for legal proceedings.

The investigating manager will meet you as soon as possible to establish facts and support you. Support will be determined on a case-by-case basis and may include provision of information, a temporary transfer to a different work place or a period of paid absence to remove or protect you or another person from the situation.

Where it is known who has raised concerns under this policy MJCA will aim to provide as much feedback as possible to the individual in relation to the findings from the investigation. MJCA are unable to disclose the precise action taken if this would infringe a duty of confidence owed to someone else.

The HR Department will provide support and guidance to managers in the event of any concerns raised under this policy.

### **Data Protection**

Written records of conversations recorded by the investigating person regarding a significant concern will be stored in accordance with the requirements of the General Data Protection Regulations.

### **Communication of this policy**

Employees are provided with details of this policy with their company staff handbook when they join MJCA

### **Who is responsible for the policy?**

The Board of Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations.

### **Monitoring and review**

This policy will be monitored for effectiveness and reviewed annually.