

<b>Company Name:</b>	Twenty-Four Seven Recruitment Services Ltd					
<b>Policy Name:</b>	Whistleblowing Policy					
<b>Review Date:</b>	V1 undated	V2 23/02/22				
<b>Reviewed and authorised by:</b>	Amanda Lillis - HR Director					

### Policy Statement

This Policy and Procedure sets out the Company's commitment to high standards of ethical, moral, and legal business conduct. The Company is committed to the highest possible standards of openness, probity, and accountability. In line with that commitment, we expect all staff, temporary-workers, and others that we deal with, who have serious concerns about any aspect of the organisations work to come forward and voice those concerns.

In line with this commitment, and our commitment to open communication, this policy also aims to provide an avenue for all Staff, temporary-workers, and Jobseekers to raise concerns regarding malpractice within the business and/or whilst on assignment at the client premises. The Company intends to encourage all individuals to speak out and also provide reassurance that they will be protected from reprisals or victimisation for Whistleblowing.

This policy is fully supported by Senior Management.

### Responsibilities

Staff in the following roles are responsible for implementing this policy and procedure.

- The Group Managing Director has overall and final responsibility for this policy.
- The HR Director is responsible for implementing systems and procedures that are compliant with national legislation, and, for monitoring, reviewing effective implementation and co-ordinating improvements to the Whistleblowing policy.
- Whilst the onus of Whistleblowing falls primarily on Senior Management, all Staff/Workers have obligations to take all reasonable care for upholding the Company Policy and Procedure to ensure staff/Workers are safeguarded when reporting concerns to us under the Whistleblowing policy. Also to ensure the individual can do so without fear of penalty, dismissal or reprisal of any kind. The Company is committed to ensuring all Staff/Workers are safeguarded when reporting concerns to us under the Whistleblowing Policy.
- Operations staff are responsible for being vigilant day to day at clients' sites in order to identify any concerns or triggers that a temporary-worker user may be subject to and also work collaboratively with the client to ensure Staff/Flexi Workers are aware they can highlight these concerns.
- All managers are responsible for ensuring all Staff adhere to the Policy.

### Scope

The Whistleblowing policy applies to All Staff and temporary workers all levels and all workers supplied by a recruitment Intermediary or Sub-Contracted labour provider. It also applies to jobseekers in the recruitment supply chain to ensure they are aware to whistleblow, make complaints and report violations if required to

a qualified, independent or impartial third-party entity.

### **Whistleblowing**

The Public Interest Disclosure Act 1998 is a key piece of UK legislation protecting individuals who ‘blow the whistle’ in the public interest. An individual may raise concerns about malpractice or wrongdoing in the workplace or provide certain types of information, usually about illegal or dishonest practices within an organisation. The information, which has come to the individual’s attention through their work, is provided to the employer or a regulator.

Some general examples of whistleblowing matters include: (although not limited to)

- Criminal offences or activities
- Exposing fraud
- Financial mismanagement or corruption
- Mis-selling of pensions or financial products
- Health and safety issues concerning the workplace that puts the safety of workers or visitors at risk
- Failure to investigate allegations of sexual assault by one employee against another
- Failure to comply with legal obligations, or likelihood of failure to comply with legal obligations
- Breaches of legislation, for example the Data Protection Act
- Payments in exchange for awarding contracts
- Risks to the environment

Complaints which aren’t considered to be whistleblowing:

Personal grievances, which include bullying, harassment and discrimination. These types of complaints will not be covered by whistleblowing law, unless your particular case is in the public interest. Such complaints raised regarding threats of physical, sexual, emotional or psychological bullying or abuse or other forms of intimidation are effectively remedied through our credible grievance process which is operated and investigated by appropriately trained, competent staff.

### **Policy**

The Company believes that all Staff/Workers, regardless of rank or grade, have the right to raise concerns regarding malpractice within the business and/or whilst on assignment at the client premises and reassurance that they will be protected from reprisals or victimisation for Whistleblowing. This policy aims to encourage and provide multiple avenues for all Staff/ workers and Jobseekers with concerns; to be raised directly to the company or via relevant third-party organisation.

### **Raising a concern**

In the first instance the concern must be raised with the local 24-7 representative or line manager.

To escalate the concern further or to bypass the 24-7 representative or line manager (only if required) the concern can be reported in writing to the Human Resources department via email to [hr@24-7recruitment.net](mailto:hr@24-7recruitment.net) or to The Company, 24-7 Recruitment Services Ltd, Oakwood House, Blackwood Business park, Ash Road South, Wrexham, LL13 9UG.

When initially making contact the HR Department will assist in suggesting best method to raise the concerns for example as a matter of public interest, rather than a complaint about how you have been treated as an individual.

Raising concerns to an external body - There are other options available if staff/ Workers do not want to report their concern directly to The Company, e.g., you can obtain legal advice, or submit the complaint to a prescribed person or body. A list of prescribed bodies an individual can make a disclosure to can be found here:

<https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies>

All jobseekers/workers in the recruitment supply chain can whistleblow, make complaints and report violations confidentially to a qualified, independent, impartial third-party entity. You have a right to go to ACAS, BEIS, CA etc. Should it be a jobseeker; we will need to identify via assistance of Human Resources on how to handle the concerns and where they need to be raised. Should there be any reluctance to raise a concern via the Company, it is actively encouraged that in order for the concern to be raised; that an external party such as the above be contacted.

Raising an anonymous complaint – The Company support anonymous complaints which are made to us; however, we may not be able to take the claim further if you have been unable to provide all of the information which is required. You can submit your name and request confidentiality when raising your concerns and The Company will ensure every effort is made in order to protect your identity.

Timing - The earlier a concern is raised, the easier The Company will be able to investigate and take action. The concern will be acted upon without delay and the staff member/ Worker notified of the action to be taken as soon as reasonably practical. It is encouraged to make The Company aware of the concern regardless of the amount of time that has passed.

Evidence - Although the complainant is not expected to prove the truth of an allegation, the employee/worker should be able to demonstrate that the report is being made in good faith.

#### **How the Concern will be handled**

The action taken by The Company in response to concern being raised under this policy; will depend on the nature of the concern.

Initial Inquiries - Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved without the need for investigation and may be dealt with informally.

Further Information – Further investigation may be required and will depend on the nature of the issue and the clarity of information provided. Further information may be sought from or provided to the complainant reporting the concern. During this process you have the right of freedom to obtain advice from trade union and have a trade union accompany you during any meeting held.

Clients – Concerns that are raised in relation to Client wrongdoing may be beyond the control of the Company. The Company shall report the complaint to an appropriate Client manager so that the Client may conduct an investigation using their procedures. Where the Client fails to follow due process, the Company shall conduct the investigation to the best of its ability.

Concerns which are raised verbally - If the concern is found to be justified, The Company will inform the complainant verbally of the action to be taken, the time scale and the person responsible. If the concern is not found to be justified, the complainant will be informed verbally of the reasons for this as soon as reasonably practical.

Concerns which are raised in writing - If the concern is found to be justified, The Company will inform the complainant in writing of the action to be taken, the time-scale and the person responsible for investigating. If the concern is not found to be justified, the complainant will be informed in writing of the reasons for this. Staff should liaise with HR re any preventative measures, proactive cohesion actions and remedial measures that could be developed and implemented.

Should the concerns detail confidential information relating to another individual, data protection laws may apply and therefore some information may be omitted in order to ensure The Company is compliant with data protection laws.

Final Stages - If the complainant is dissatisfied with how the Company dealt with the concerns, they should inform a senior member of staff or contact the Human Resources department for further guidance. If it is perceived the concern wasn't taken seriously or the wrongdoing is continuing to take place, they have the right to contact a prescribed person or body to report the concerns. In any case the concern can be reported to Human Resources who will be able to provide any support or assistance if required as to address further concerns.

### **Training**

All relevant staff are trained and/or have the knowledge and skills needed to adhere to the Whistleblowing policy and procedure competently. The required knowledge and skills include those required to:

- Competently carry out their duties and cope with the associated actions with whistleblowing situation being brought to their attention.
- Understand the requirements set out in current and applicable laws and guidance.
- Understand the related accompanying policies, procedures and documents.
- To Identify potential concerns with Staff/Flexi-Workers in relation to Whistleblowing.
- Encourage Staff/Flexi-Workers to raise concerns without fear of reprisal.
- Understand when and how to escalate potential issues.

### **Non compliance**

The Company takes its commitment to the policy seriously and so, in cases where the Policy and Procedure has not been adhered to, the Company may deal with such matters via the Company disciplinary procedure.

### **Monitor and Review**

The HR Director is responsible for the continuous improvement of the Whistleblowing policy, including:

- Ensuring the required data is recorded as part of routine practices.
- Recording the number and detail of concerns raised or and how they have been resolved.
- Recording any suggestions or ideas raised to improve the policy and procedure and whether they have been actioned.
- Ensuring the most up to date legal and other requirements have been identified.
- Policy and procedure reflect practice.
- Policies and documents are updated or developed, and training or re-training is applied to ensure relevant individuals have the required understanding and skills.
- Updating the policy where required.