

Whistleblowing Policy and Procedure

Aims of this Policy

It is important that any criminal behaviour or other wrongdoing by an employee, or any individual undertaking work with the organisation is reported and properly dealt with.

This Whistleblowing policy is underpinned by the Public Interest Disclosure Act 1998 (known as the Whistleblowers Act). This gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. The organisation is committed to ensuring that no member of staff should feel at a disadvantage in raising legitimate concerns.

Scope of the policy

This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to other procedures e.g. disciplinary. These concerns could include:

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or statutes
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Attempts to conceal any of these

Confidentiality

The organisation will treat all such disclosures in a confidential and sensitive manner. The identity of the employee making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

Procedure

If an employee has a concern, they should first raise it with Dean Goodwin Company Secretary, verbally or in writing. If they feel that this person may be involved or do not wish to approach them, then they should approach The Police.

If the employee feels a Director may be involved, the employee should report the matter to the appropriate external agency.

The organisation will ensure that an investigation takes place and make an objective assessment of the concern. This may involve an investigation, subsequent report and recommendations. The employee will be kept advised of progress and the organisation will ensure the action necessary to resolve the concern is taken.

In all cases, the employee is encouraged to exhaust AIM CIC internal procedures before contacting external sources such as the Health & Safety Executive, Environment Agency, Police etc.

Monitoring and review of the policy

The policy will be reviewed in line with the Company's programme of policy reviews. The AIM CIC Board will monitor the policy to ensure its effectiveness.

Dean Goodwin

Company Secretary

Date of Policy Review: 1 October 2023 Next Review of Policy: 1 October 2026