



A HOME
FOR
HUMAN
POTENTIAL

Whistleblowing Policy

POLICY CHANGE RECORD	
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Introduction

Whistleblowing is one of the most effective ways of preventing and eliminating wrongdoing at work. Reall is committed to good practice and wishes to ensure high standards in this area.

Whistleblowing law is located in the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998, and aims to ensure the highest standards of propriety in public life. The Act provides protection to employees who act reasonably and responsibly in raising matters of concern regarding the conduct of their organisation. Protection is not guaranteed to employees who make disclosures externally, e.g., to the media, when the matter could and should have been raised internally.

We recognise that raising a whistleblowing concern can be daunting, not least because of the fear of reprisals from those responsible for the alleged malpractice, however, we encourage you to report concerns internally as soon as possible where you suspect wrongdoing.

This Policy sets out Reall's response to the Public Interest Disclosure Act 1998 (PIDA) and aims to:

- encourage individuals to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- provide individuals with guidance as to how to raise those concerns.
- reassure those making disclosure that they are able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

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.

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

Scope

This Policy applies equally to:

- Colleagues of Reall
- Agency workers
- Self-employed people / contractors / other workers working for Reall in any capacity
- Interns
- Members of Reall's Board / Directors of the company

This Policy is therefore designed to allow all with contact with Reall the opportunity to express genuine concern and disclose information at an appropriate level.

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 Reall's 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 Human Resources for further advice.

Whistleblowing concerns to which this policy relates

Whistleblowing is the term used when a colleague passes on information concerning an act of suspected wrongdoing, or risk of wrongdoing. This will typically, though not necessarily, be something they have witnessed at work.

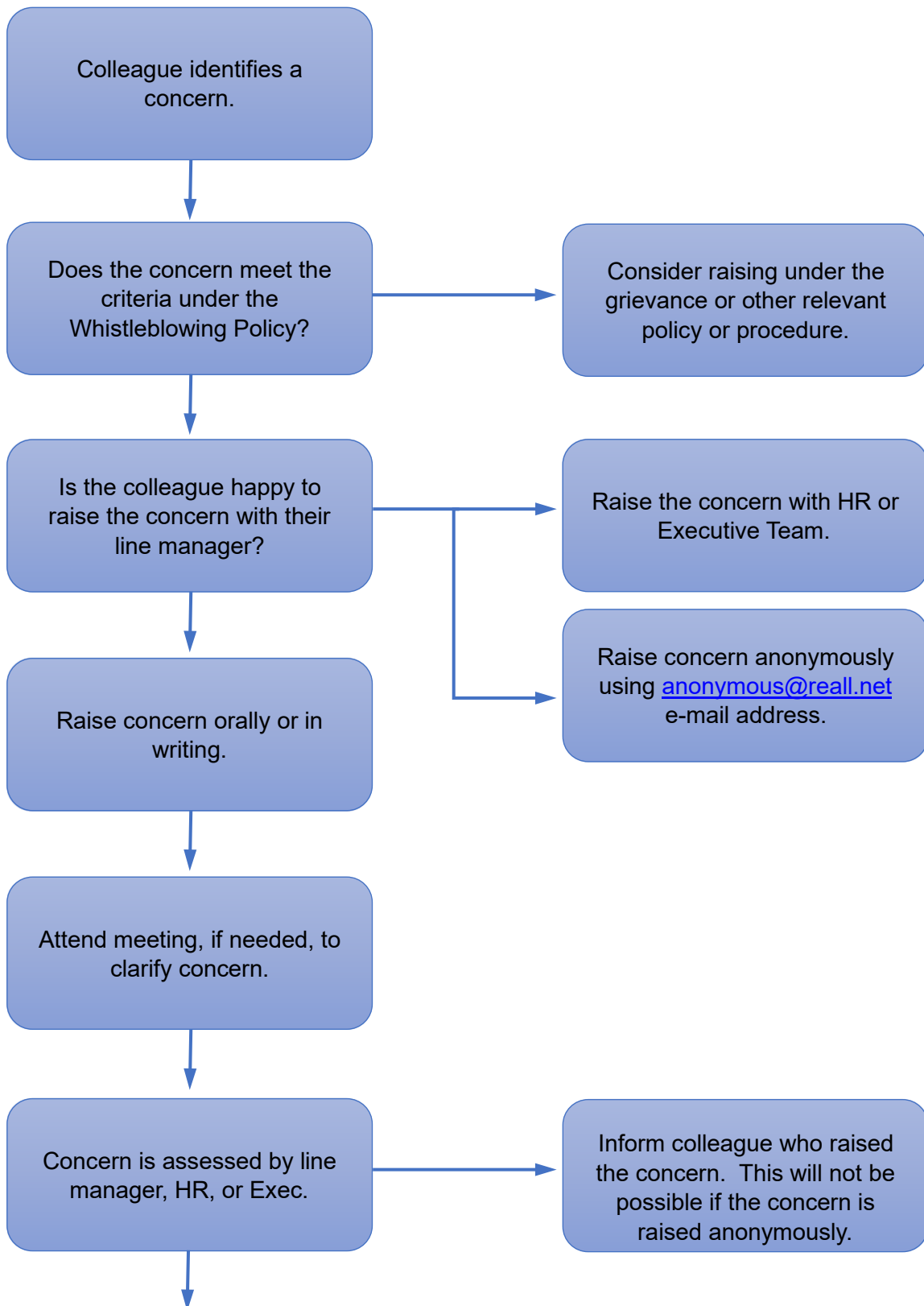
It is not necessary for the person making the disclosure to prove the wrongdoing, but to be protected by whistleblowing law against detrimental treatment or dismissal, they must reasonably believe that they are acting in the public interest. This means, in particular, that personal complaints and grievances are not usually covered under whistleblowing law.

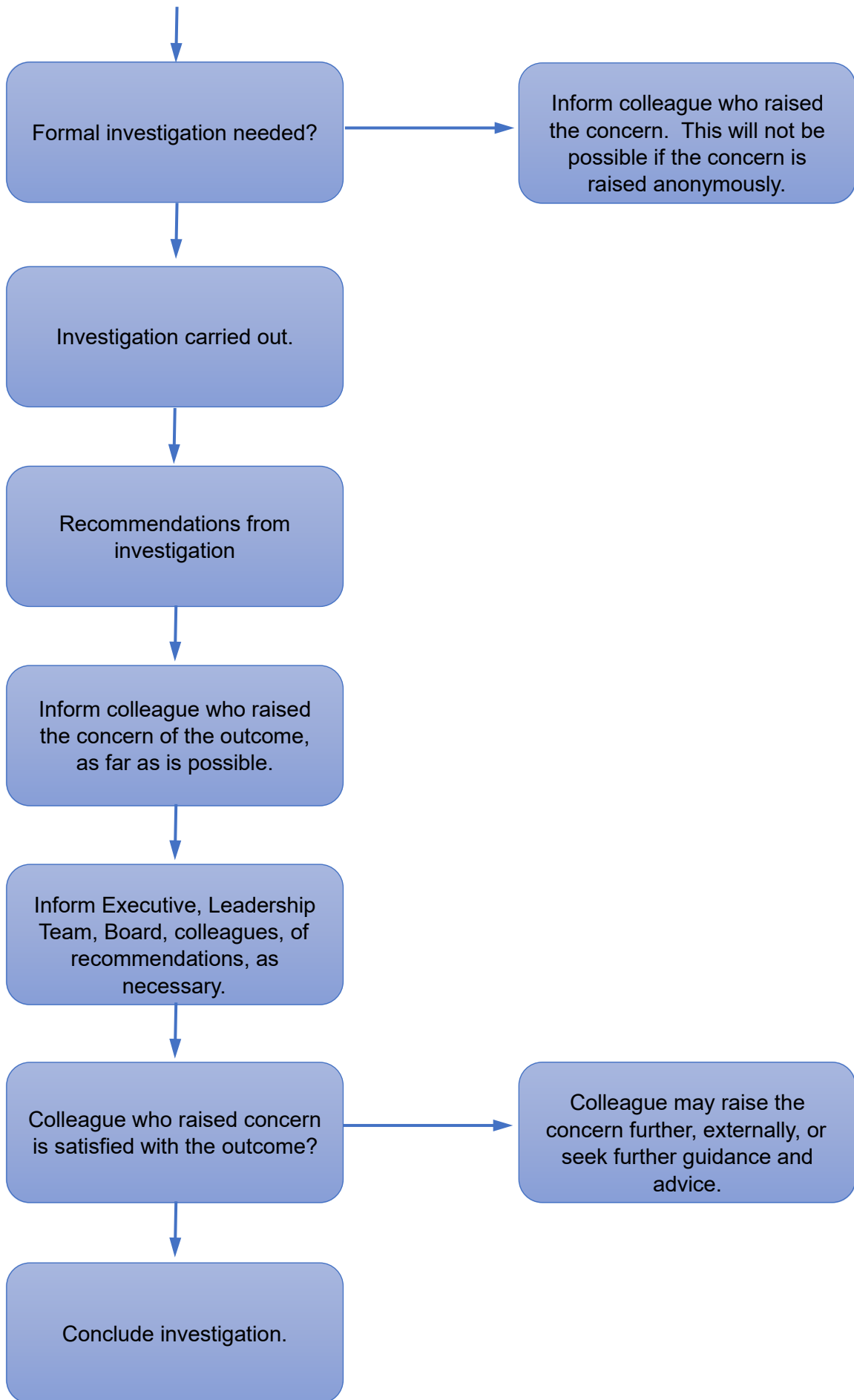
The person making the disclosure must also reasonably believe that it shows past, present, or likely future wrongdoing that falls into one or more of the following categories:

- a criminal offence – this may include, for example, financial impropriety, fraud, or theft.
- 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
- an attempt to cover up wrongdoing in any of the above categories

Overview Flowchart

If a colleague has a concern that they wish to report under this Whistleblowing Policy, then this is the process:





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 in the first instance. 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 Human Resources or member of the Executive Team. This includes if your concern involves either the CEO and/or the Board.

You can raise your concern orally, or in writing, and it is important that you set out clearly:

- the details of the suspected wrongdoing
- the names of any individuals involved, 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 after you have raised the concern. 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 Human resources team may need be present.

Stage 2 - Responding to your whistleblowing concern

After a concern has been raised, an initial assessment will be carried out to consider whether the disclosure falls within the scope of this Policy.

If the disclosure falls within the scope of this Policy, a decision will be taken as to next steps, including on whether a formal investigation is necessary. An investigation will depend on the nature of the matter raised and may involve:

- an internal investigation conducted by an independent senior colleague of Reall
- a paper-based exercise by an independent senior colleague of Reall
- referral to an appropriate external person (e.g., the Police if the matter involves allegations of criminal activity)

The person making the disclosure will be informed of the outcome of the initial assessment, and may be required to attend a meeting, or meetings, in order to provide further information.

If an investigator is appointed, the investigator may make recommendations for changes to enable Reall to learn from the experience and avoid / mitigate against any future wrongdoing or harm.

Reall will aim to keep the person who makes the disclosure informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent Reall from giving the individual specific details of the investigation or any disciplinary action taken as a result. The person making the disclosure should treat any information about the investigation as confidential. If it is concluded that a person making a disclosure has made false allegations maliciously, that person could be subject to disciplinary action.

Stage 3 - If you are not satisfied

Whilst Reall cannot always guarantee the outcome an individual is seeking, it will try to deal with the concern fairly and in an appropriate way. Colleagues can help Reall to achieve this by using this policy. If a colleague is not satisfied with the way in which their concern has been managed, this can be raised with one of the other key contacts listed and set out at the end of this Policy.

Confidentiality and anonymity

Reall hopes that individuals will feel able to voice whistleblowing concerns openly under this Policy. However, if an individual wishes to raise a concern confidentially, it will make every effort to keep that person's identity secret. If it is necessary for anyone investigating the concern to know that person's identity, this will be discussed with the person who has raised the concern.

Reall does not encourage individuals to make disclosures anonymously. Proper investigation may be more difficult or impossible if Reall cannot obtain further information from the person who has

made the disclosure. It is also more difficult to establish whether any allegations are credible. Those making disclosures who are concerned about possible reprisals if their identity is revealed, should discuss the matter first with Human Resources, and attempts will be made to take appropriate measures to preserve confidentiality. If an individual is in any doubt, advice can be sought from Protect, the independent whistleblowing charity, who offer a confidential helpline, and contact details are included at the end of this Policy.

We encourage anonymous reporting over remaining silent about your concerns, and whilst 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 able to provide you with any feedback. You can report a concern anonymously to our internal whistleblowing e-mail address, anonymous@reall.net using any appropriate external gateway.

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 Human Resources, or you can raise it under our grievance procedure. 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 and will be dealt with under our disciplinary procedure.

Raising your whistleblowing concerns externally

We encourage you to raise your whistleblowing concerns internally in the first instance. If, however, 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](https://www.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.

Further Guidance

If you need further guidance or support, you can contact the whistleblowing charity [Protect](https://www.protect.org.uk) or [Citizens Advice](https://www.citizensadvice.org.uk) for free, confidential advice.