

Whistleblowing Policy

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1. Introduction

Settle is committed to good governance so we want to make sure there is a fair and effective mechanism for you to raise concerns about malpractice, illegal acts, breaches of codes of conduct and other concerns of a legal or ethical nature, which may have an impact upon or threaten the wider public interest. This is commonly known as "whistleblowing".

We are committed to resolving concerns raised as soon as possible to ensure high standards of practice. This policy sets out the guiding principles for ensuring that whistleblowing issues are dealt with in a fair, timely and consistent way across Settle. This policy has been developed in accordance with the Public Interest Disclosure Act (PIDA) 1998 (and any subsequent amendments), whereby employees and workers who raise legitimate concerns about specified matters, or "protected disclosures", are protected from being treated badly or dismissed.

When you make a disclosure, we will process any personal data collected in accordance with the data protection and cyber security policy. Data collected from the point at which you make the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

This policy applies to all employees, casual and agency workers, students and contractors.

2. What is whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. Examples of a qualifying disclosure include (but are not limited to):

- Financial impropriety, fraud, mismanagement or money-laundering
- Danger to health and safety
- Damage to the environment
- Bribery
- Facilitating tax evasion
- Failure to comply with a legal duty
- Criminal acts
- Miscarriages of justice; and
- Deliberate concealment of information related to the above examples.

A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of Settle's activities (a whistleblowing concern) you should report it under this policy.

The whistleblowing policy is primarily for concerns which you may have where the interests of others, the Charity or both are at risk. If concerns relate to a personal grievance, or complaints relating to your own personal circumstances, such as the way you have been treated at work, the Grievance Policy should be followed instead. Similarly, the whistleblowing policy is not an appeal mechanism for other procedures, unless you feel that the other process was compromised as a result of having raised concerns under this policy.

3. What happens if you raise concerns under this policy?

We will support you if you raise genuine concerns under this policy. If you do raise concerns under the whistleblowing policy, you will be protected from reprisal, victimisation, discrimination or any form of disciplinary sanction. Your continued employment, opportunities for future training or promotion will not be prejudiced because you have raised a legitimate concern.

If you believe that you have suffered any negative treatment as a result of whistleblowing, you should inform the person dealing with the matter immediately. You can also raise a formal complaint under the grievance procedure.

If we conclude that an individual has made false allegations maliciously or with a view to personal gain, they will be subject to disciplinary action.

4. Can I raise these concerns anonymously?

This Policy is intended to reassure you so that you have the confidence to raise a concern that you reasonably believe is in the public interest and is a means of improving standards. We would always encourage team members not to make disclosures anonymously. This can make proper investigation more difficult or impossible if we cannot contact you to obtain further information. If you are concerned about possible repercussions if your identity is revealed, we recommend you discuss this with an appropriate manager so you can discuss the best way to maintain your confidentiality.


However, we also understand that there may be exceptional situations where you wish to raise a concern in confidence and to remain anonymous. If a concern is raised anonymously,

or if you ask for your identity to be protected, we will not reveal it unless it is necessary in order to investigate and resolve the concern. This will be considered on a case-by-case basis and discussed with you before any disclosure is made. In some cases, there may be circumstances where your identity may be made public. This could happen during legal proceedings, disciplinary or police investigations. In some cases, Settle may be forced to disclose your identity by a court order.

5. Procedure

In many cases concerns may be resolved between you and your line manager. We encourage you to report your concerns in the first instance, verbally or in writing, to your line manager as soon as you become aware that the alleged act or omission is happening, or has happened, or is likely to happen. When you raise the concerns, it is helpful if you include any thoughts you may have on how they can be resolved.

Where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact the Chief Operating Officer.

It is important that any disclosures are reported promptly to allow us to investigate as quickly as possible. An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, you should not agree to remain silent. You should report the matter to the Chief Operating Officer.  If your concern is related to the conduct of the COO or the CEO, then you can report your concern directly to the designated Whistleblowing Trustee: kathy.mohan@outlook.com

The line manager will acknowledge receipt, in writing, usually within 5 working days or as soon as reasonably practicable. They will usually arrange a meeting with you as soon as possible to discuss the concern. You may bring a colleague or union representative to any meetings. The companion must respect the confidentiality of the disclosure and any subsequent investigation. The purpose of the meeting will be to discuss the concern in more detail and discuss proposals for dealing with the matter.

The person investigating will keep you updated as to the progress of any investigation and timescales. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

We will provide appropriate feedback to you following your disclosure to demonstrate that the concerns are being addressed and reassure you that appropriate action has been taken. If no action is to be taken, you will also receive an explanation as to why.

In the event that you are not satisfied with how the matter has been dealt with, you may raise this with a more senior manager. You must set out the full reasons why you are dissatisfied in writing. The manager will keep you updated on any further action taken as appropriate.

If on conclusion of a review by the senior manager you reasonably believe that the appropriate action has not been taken, you should report the matter to the proper authority. The PIDA legislation sets out a number of bodies to which qualifying disclosures may be made. These include:

- HM Revenue & Customs;
- the Financial Conduct Authority;
- the Competition and Markets Authority;
- the Health and Safety Executive;
- the Environment Agency;
- the Independent Office for Police Conduct; and
- the Serious Fraud Office.

You may want to seek advice before reporting a concern to anyone externally. The independent whistleblowing charity, Protect, on 020 3117 2520 or [Protect - Speak up stop harm - Whistleblowing Homepage \(protect-advice.org.uk\)](https://protect-advice.org.uk) operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern.