



## WHISTLEBLOWING POLICY

Policy Owner: Gavin George – Chief Executive Officer  
Review & Control: Laura Creasey – Head of People

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### LAINE'S WHISTLEBLOWING POLICY

This policy sets out Laine's procedure for raising concerns about incidents of malpractice or mismanagement in the workplace, and how we will deal with those concerns. This could relate to any practice, procedure or policy carried out by any officer or team member.

For example, a breach of rules, irregularity, a danger to team members or customers, financial malpractice, breach of legal obligations, or something that may damage the environment.

The Public Interest Disclosures Act 1998 encourages staff to raise their concerns internally about wrongdoing in the workplace.

This includes concerns about:

- Someone having committed, or being likely to commit, a criminal offence.
- Failure to comply with any legal or regulatory obligation.
- Miscarriage of justice.
- Something which endangers the health and safety of an individual.
- Damage to the environment.
- Fraud or financial irregularity.
- Blackmail, corruption, or bribery.
- Deliberate concealment relating to any of the above.

Wrongdoing is anything that it is illegal, improper, or unethical, and may impact the image and/or profits to Laine. Misconduct and malpractice can happen in any company and can go undetected and unpunished if those who know about it are afraid to speak out.



Individuals are therefore encouraged to come forward with any information if they feel it is appropriate to do so. Any disclosure made that is thought to be true, even if it turns out that you are mistaken, will be protected by this policy if you have a reasonable suspicion that malpractice has occurred, is occurring or is likely to occur. We do, however, ask that team members do not carry out investigations of their own accord, as this could cause issues with any future investigation or alert individuals and result in the destruction of evidence.

## HOW TO RAISE A CONCERN

At Laine, our first aim is to minimise the likelihood of workplace malpractice from occurring. If it happens, we ideally will make arrangements to prevent the incident from recurring. If appropriate, we will make every effort to resolve the situation promptly. If that isn't possible, we will then take further action to investigate the matter fully and take appropriate action. If you have a concern about workplace malpractice, you should first discuss it with your manager, or Head of department. They will attempt to resolve the matter as promptly as possible.

There may be circumstances where you may need to speak with someone other than your manager or Head of Department. In these situations, you can raise any of your concerns directly, in confidence, with one of the people listed below.

Gavin George – Chief Executive Officer  
Tel: 07974 985914  
Email: Gavin@laine.co.uk

Laura Creasey – Head of People  
Tel: 07552 475546  
Email: Laura@laine.co.uk

## HOW TO REPORT A CONCERN

Any individual alleged to have carried out wrongdoing will be dealt with in accordance with the Laine's Ethics and Code of Conduct Policy, the formal Disciplinary Procedures Policy and if necessary, the law.

The individual(s) alleged to have carried out wrongdoing will be notified of the allegation made against them as soon as is practically possible. Laine will proceed with an internal investigation and, if necessary, will also call-in external support or report the matter to the Police if required.

However, any team member reporting a wrongdoing can be assured that Laine will deal with the matter sensitively and confidentiality will always remain a priority. The investigation will be carried out as quickly as possible. It is not possible to lay down precise timescales for the investigation as this very much depends on the nature of the allegation, and Laine will wish to carry out suitable enquiries.





Laine will write to the individual who has notified us of the alleged wrongdoing, to acknowledge the complaint, and the team member will be kept informed on the progress of the investigation and once concluded, the outcome.

## INVESTIGATION PROCESS

Any individual who believes that they have been subject to, or have witnessed harassment, victimisation or bullying have access to channels through which complaints can be raised. All claims of bullying and harassment will be dealt with initially in accordance with the company grievance procedure. However, given the nature of harassment, victimisation or bullying is such that it is recognised that an individual may not wish to discuss it initially with their immediate manager or supervisor. It may be more appropriate to discuss with another manager or the People Team.

All complaints will be taken seriously and dealt with confidentially and promptly. Normally, cases will be concluded within two to four weeks, some cases will take longer depending on availability and complexity.

## CONFIDENTIALITY

Laine will not disclose your identity, if known, at any time, unless it's necessary to do so for the purposes of the investigation, obtaining legal advice, or to comply with a legal or regulatory obligations. We will ensure you are made aware before providing any identification.

We will commit to ensuring that you are not subject to further harassment, victimisation, or disciplinary action because of raising your concerns. And, as far as possible, any supporting evidence relating to your disclosure will be kept secure at all times.

If you wish to report anonymously you can do this via a form on the Laine website:  
COMPLAINTS — LAINE CAREERS

## ADDITIONAL INFORMATION

Public Concern at Work (PCAW), founded in 1993, is a leading authority on public interest whistleblowing. Its charitable objectives are to promote compliance with the law and good practice in organisations across all sectors. In practical terms, it focuses on the responsibility of workers to raise concerns about malpractices and the responsibility of those in charge to investigate and remedy such issues.

PCAW provides free advice and assistance to individuals who are concerned about wrongdoing in the workplace.

You can personally contact PCAW on 020 7404 6609 or [whistle@pcaw.org.uk](mailto:whistle@pcaw.org.uk)



## POLICY REVIEW

Laine reviews the Whistleblowing Policy annually and we will ask that all team members make a declaration of compliance with this Policy.

VERSION NUMBER	AUTHOR	PURPOSE/CHANGE	DATE
1	Laura Cressey		1.1.24

