



WHISTLEBLOWING POLICY

Introduction

Blue Box Medical believes that good communication at all levels through the company and with other external organisations promotes better work practice. We seek to conduct ourselves with honesty and integrity at all times but we acknowledge that all organisations face the risk of their activities going wrong from time to time, or of unknowingly harbouring malpractice. We will take appropriate measures to identify such situations and attempt to remedy them. On this basis, we encourage anyone within our company or supply chain to raise genuine concerns about malpractice in the workplace without fear of reprisals and to ensure them that they will be protected from victimisation or dismissal.

Authority for Whistleblowing

Overall authority for this policy lies with the Directors.

Managers have responsibility to facilitate the operation of this policy and to ensure that staff feel able to raise concerns without fear of reprisals, in accordance with the procedure given below. All staff are responsible for the success of this policy and should take steps to report any wrongdoing or malpractice of which they become aware.

Scope

This policy applies to all employees of Blue Box Medical and those within our supply chain (it also covers anti-slavery and human trafficking within our supply chain and any issues should be flagged via this channel). Blue Box Medical has introduced these procedures to enable concerns about malpractice in the workplace to be reported at an early stage and in the right way. If an individual raises a genuine concern and is acting in good faith, even if it is later discovered that they are mistaken, under this policy they will not suffer any form of retribution as a result. This assurance will not be extended to an individual who maliciously raises a matter they know to be untrue or who is involved in any way in the malpractice.

The term 'malpractice' includes but is not exhaustive of:

- Criminal offences
- Breaches of legal obligations
- Unsafe working conditions
- Bullying culture
- Financial irregularities
- Ethical irregularities

This policy is not for people with concerns about their employment which only affects them. If any concern is a personal complaint about your employment that only affects you, then the matter should be raised as a grievance using the company's Grievance procedure.

Confidentiality

Every effort will be made to keep the identify of a person reporting any malpractice confidential, at least until any formal investigation is under way. In order to avoid jeopardising the investigation into the alleged malpractice, you will also be expected to keep the fact that you have raised a concern, the nature of the concern and the identify of those involved confidential.

Procedure for Raising a Concern

If you have a genuine concern to raise, you should initially contact your line manager. Where this is not appropriate because the line manager is involved in the alleged malpractice in some way, the matter should be raised with a Director or, in exceptional circumstances, you may raise the matter with our HR Consultant, Deborah.Witcomb@hrdept.co.uk.

1. Once a disclosure is made, we will record your concern and send a written acknowledgement within two working days, confirming that the matter will be investigated and that we will get back to you in due course.
2. A suitable person will be identified to manage the disclosure. This will be someone who is in a position to take any necessary action as an outcome.
3. A suitable individual (who has had no previous involvement in the matter) will be instructed to conduct an investigation. We aim to start the investigation within two weeks of the disclosure. The length and scope of the investigation will depend on the subject matter of the disclosure.
4. You may be asked to provide further information during the course of the investigation.
5. The investigation report will be reviewed by the person managing the disclosure.
6. Appropriate action will be taken which could involve initiating a disciplinary process or informing external authorities if a criminal action has taken place, eg fraud or theft. We will inform you if a referral to an external authority is about to or has taken place, although we may need to make such a referral without your knowledge or consent if we consider it appropriate.
7. If it is found that there is not sufficient evidence of malpractice or the actions of the individual(s) are not serious enough to warrant disciplinary action, it may be more appropriate for the manager to take a more informal approach to dealing with the matter.
8. You will receive written notification of the outcome of the investigation, though not all the details or a copy of the report.
9. Possible outcomes of the investigation could be that:
 - a. The allegation could not be substantiated; or
 - b. Action has been taken to ensure that the problem does not arise again. You will not, however, be given details about the action taken as this could breach the human rights of the person(s) involved
10. If you are not satisfied with the response you have received you should raise the matter with a Director.
11. If you have asked to remain anonymous, care will be taken to respect this request.

Corrective Action and Compliance

As part of the investigation into disclosures made under this Policy, recommendations for change will be invited from the investigator to enable us to minimise the risk of the recurrence of any malpractice or impropriety which has been uncovered. The Directors will be responsible for reviewing and implementing these recommendations in the future and will be discussed at the Management Review Meeting.



Michael Coleman
Director



Mark Pedley
Director

Signed: 8 January 2018

Next Review: January 2019