

Whistleblowing Policy

Policy Statement

Shared Interest Society and Shared Interest Foundation (“Shared Interest” or “we”) are committed to conducting business with honesty and integrity. Whomever we deal with, and wherever we may operate, we are committed to doing so lawfully and ethically. It is the responsibility of each and every colleague to ensure that we fulfil this commitment in our day to day working lives. However, from time to time, there may be situations where the right course of action is unclear, or where you suspect or know that something is improper, unethical or inappropriate. All have both a legal and moral duty to take appropriate measures to identify such situations and attempt to remedy them.

It is sometimes difficult to know whether to speak up about something that concerns us. Often people are reluctant to get involved but this could result in serious consequences for Shared Interest and its people. That is why we have put in place this Whistleblowing Policy, so that you can talk to someone confidentially and have your concerns taken seriously.

Policy aims

The aim of this policy is to:

- Ensure all colleagues feel supported in speaking up in confidence and reporting matters they suspect may involve anything improper, unethical or inappropriate;
- Encourage all improper, unethical or inappropriate behaviour to be identified and challenged at all levels of the organisation;
- Provide clear procedures for the reporting of such matters;
- Manage all disclosures in a timely, consistent and professional manner;
- Provide assurance that all disclosures will be taken seriously, as far as reasonably practical, treated as confidential and managed without fear of retaliation.

When should I speak up?

Whistleblowing is the name given to the act of the disclosure of information to the employer or the relevant authority by an individual who knows, or suspects, that the organisation is responsible for, or has taken part, in some wrongdoing.

An individual making a “protected disclosure” is given statutory protection from victimisation under the Public Interest Disclosure Act 1998 (PIDA), provided the disclosure is in the public interest.

This policy is designed to deal with concerns raised in relation to specific issues, which are in the public interest. Only genuine concerns should be reported.

Below is a non-exhaustive list of examples:

- Committing a criminal offence;
- Failure to comply with a legal obligation (e.g. breach of a contractual or other common law obligation, statutory duty or requirement or administrative requirement, including suspected fraud);
- A miscarriage of justice;
- Endangering the health and safety of any individual;
- Damage to the environment;
- Unauthorised use of Society or Foundation funds including potential fraud and corruption
- Sexual, physical or verbal abuse or bullying or intimidation of colleagues, customers or beneficiaries
- Deliberate concealment of information relating to any of the above.

These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. The organisation will take any concerns that you may raise relating to the above matters very seriously.

Colleagues must reasonably believe that the disclosure is “in the public interest”. We encourage you to use the procedure to raise any such concerns.

If you have any genuine concerns related to any of the above, you should report it under this policy.

Concerns in relation to money laundering or bribery should be referred directly to the Money Laundering Compliance Principal and not raised under this policy.

Shared Interest has other policies and procedures that deal with complaints, critical or constructive comments, and appeals. Disciplinary, Grievance, Safeguarding and Equal Opportunities policies also address standards of behaviour at work. The relevant policy should be followed where appropriate.

Who should I contact?

We recognise that, due to the potential sensitivity of the situation, you may not always feel comfortable about discussing your concerns. As soon as you become aware of any suspected wrongdoing, you should notify the matter to the Managing Director (MD) of Shared Interest or the Chair of the Audit Committee of the Board.

In situations where you feel uncomfortable in approaching the MD, because the situation involves them or you feel that there may be some conflict, or neither the MD nor Chair of Audit are contactable, you should notify the Chair of the Board.

Concerns raised under this policy will relate to colleagues but may also relate to the actions of a third party, such as a supplier, agent or partner. It may be appropriate for you to raise your concerns directly with the third party where you believe that the wrongdoing identified or suspected relates solely or mainly to their conduct or is a matter, which is their legal responsibility. However, you should consult the MD of Shared Interest before speaking to any third party.

Email: Whistleblowing@shared-interest.com

In an extreme case and where it is inappropriate to report the matter internally or such a report is not being addressed, you should consider making a report to a body such as a regulator (for example the Charity Commission). A list of possible contact organisations and details is provided at the end of this document.

Who can use the reporting process?

Any colleague or contractor can use this policy. In addition, suppliers, customers and other third parties such as consultants or partners may also use this policy to report suspected wrongdoing.

How do I speak up and what information should I provide?

You can raise your concerns by email, orally or in writing, stating that you are using the Whistleblowing Policy.

We request that, where possible, you include the information below:

- An outline of the known or suspected wrongdoing;
- Details, to the best of your knowledge, about when, where and how it occurred;
- A list of the names of those suspected of being involved (both within Shared Interest and externally);
- A list of the names of anyone who may have relevant information;
- Details of how you came to know about the suspected activities;
- What, if any, do you estimate to be the value of the loss to Shared Interest or other parties;
- What, if any, breaches of internal controls, policy, procedure or other requirements you believe took place;
- The names of anyone who you have discussed or reported this incident to;
- Your name and contact details. Please note – these will be kept confidential as far as is reasonably practicable;
- The date and time of making the report.
- You will not be expected to prove the wrongdoing that you believe you have witnessed or suspect.

Anonymity

We understand that disclosures made under this policy may involve highly confidential and sensitive matters and that you may prefer to make an anonymous disclosure. When this is the case, we will endeavour to investigate your concerns fully, although a full investigation may be impeded if we cannot obtain further information from you.

What happens following speaking up?

The person you contact will acknowledge receipt of your concern within three working days and arrange to discuss the next steps. If you attend any meetings as part of this process, you may choose to be accompanied to this meeting by a work colleague.

The person managing the meeting may report the incident to other internal departments. For example, in a case of suspected fraud, the Finance Director may be informed. Please be assured that as far as reasonably practical, these matters will always be kept confidential

and where possible, the details of the person or persons reporting the incident will be removed.

Investigation

We will decide how to respond in a responsible and appropriate manner under this policy. An investigation will be conducted as speedily and sensitively as possible in accordance with all relevant laws and regulations. If appropriate, you will be regularly informed on the progress of these investigations and any action to be taken. The purpose of this investigation is:

- To establish if wrongdoing has occurred, and if so to what extent;
- To minimise the risk of further wrongdoing, to prevent any further loss of assets, damage to reputation and to protect all sources of evidence.

We will endeavour to handle investigations as fully, promptly and fairly as possible. As far as reasonably practicable, the confidentiality of the person reporting the suspected wrongdoing will be maintained.

It is not possible to set a specific timeframe for completion of investigations in advance, as the diverse nature of potential disclosures makes this unworkable.

Any person found to be involved in any wrongdoing will be subject to investigation using the disciplinary procedure (in the case of colleagues) or may have their contract terminated (in the case of consultants, temporary staff or contractors). Where it is believed that criminal activity has taken place, the matter may be reported to the police and appropriate legal action taken.

Protection

No one who reports any concern under this policy in good faith will be subjected to any detriment for coming forward, regardless of whether or not the concern is ultimately substantiated. In the event that a reporter believes that they are being victimised or subjected to a detriment by any person within the company as a result of reporting a concern, or assisting the company in any investigation under this policy, they must inform the MD or Chair of the Board immediately and appropriate action will be taken to protect them from any reprisal.

Reporting in good faith

If you make an allegation in good faith, but it is not confirmed by investigation, no action will be taken against you. If, however, you make allegations that are malicious or simply to cause anger, irritation or distress, disciplinary action may be taken against you.

Treatment by others

Bullying, harassment or any other detrimental treatment afforded to a colleague who has made a qualifying disclosure is unacceptable. Anyone found to have acted in such a manner will be subject to disciplinary action.

GDPR protection and privacy

All information shall be treated confidentially as far as reasonably practicable but there may be circumstances where, because of the nature of the investigation or disclosure, it will be

necessary to disclose your identity. In such circumstances, every effort will be made to inform you before such disclosure is made.

If it is necessary for you to be involved in an investigation (for example by providing evidence), the fact that you made the original disclosure will, so far as reasonably practicable, be kept confidential and all reasonable steps will be taken to protect you from any victimisation or detriment as a result of having made a disclosure.

Email address to report any concerns: whistleblowing@shared-interest.com

Contact details for potential disclosure points IF reporting internally is not possible or appropriate.

Charity Commission – 03000 669 197 www.charitycommission.gov.uk

Children's Commissioner – 020 7783 833 www.childrenscomissioner.gov.uk

HM Revenue & Customs – 0800 788 887 www.hmrc.gov.uk

Financial Conduct Authority – 020 7066 1000 www.fca.org.uk

Health & Safety Executive – 0300 003 1647 www.hse.gov.uk

Environment Agency – 03708 506 506 www.environment-agency.gov.uk

Armstrong Watson (External auditor) – 0191 434 0830 www.armstrongwatson.co.uk