



# **Our Policy for handling concerns raised (whistleblowing)**

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Purley Way  
Croydon CR0 0XZ

**Co Reg No: 10565119**

**VAT Reg No: 302945811**

**Licensed by Transport for London**

## INTRODUCTION

1. Employees and workers are often the first to realise that there may be something wrong within the Business. Usually these concerns are easily resolved. However, when the concern feels serious because it is about a possible fraud, corruption or misuse of position that might affect others or the Business itself, it can be difficult to know what to do.
2. You may be worried about raising such a concern and may think it best to keep it to yourself, perhaps feeling it's none of your business or that it's only a suspicion. You may feel that raising the matter would be disloyal to colleagues, managers or to the Company. You may decide to say something but find that you have spoken to the wrong person or raised the issue in the wrong way and are not sure what to do next.
4. The Company is committed to running the organisation in the best way possible and to do so we need your help. We have introduced this policy to reassure you that it is safe and acceptable to speak up and to enable you to raise any concern you may have about malpractice at an early stage and in the right way. Rather than wait for proof, we would prefer you to raise the matter when it is still a concern.
5. This Raising Concerns Policy is intended to encourage and enable employees, workers and partners to raise serious concerns. This policy applies to all those who work for us; whether full-time or part-time, employed through an agency, contractors or as a volunteer. If you have a concern, please let us know.
6. These procedures are in addition to our standard complaints and grievance procedures. We understand that you may not wish to raise the issue with your immediate line manager who may be the source of your concerns. In particular we have implemented this policy to address:
  - conduct which is an offence or a breach of law
  - disclosures related to miscarriages of justice
  - health and safety risks, including risks to the public as well as other employees
  - the unauthorised use of public funds
  - possible fraud and corruption
  - sexual, physical, verbal or financial abuse of clients

**If in doubt - raise it!**

## **OUR ASSURANCES TO YOU**

7. The Directors are committed to this policy. If you raise a genuine concern under this policy, you will not be at risk of losing your job or suffering any form of retribution as a result. We will not tolerate the harassment or victimisation of anyone raising a genuine concern. Provided you are acting honestly and reasonably believe it to be in the public interest or the wider interest of your colleagues and the Business, it does not matter if you are mistaken or if there is an innocent explanation for your concerns. Of course, we do not extend this assurance to someone who maliciously raises a matter they know is untrue.
8. With these assurances, we hope you will raise your concern openly. However, we recognise that there may be circumstances when you would prefer to speak to someone in confidence first. If this is the case, please say so at the outset. If you ask us not to disclose your identity, we will not do so without your consent unless required by law. You should understand that there may be times when we are unable to resolve a concern without revealing your identity, for example where your personal evidence is essential. In such cases, we will discuss with you whether and how the matter can best proceed.
9. Please remember that if you do not tell us who you are it will be much more difficult for us to look into the matter. We will not be able to protect your position or to give you feedback. Accordingly, you should not assume we can provide the assurances we offer in the same way if you report a concern anonymously.

## **HOW TO RAISE A CONCERN UNDER THIS POLICY:**

10. As a first step, you should normally raise concerns with your immediate manager or team leader. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice.
11. If you are unable to raise the matter with your manager, for whatever reason, please raise the matter with one of the Directors listed below. You should make it clear in your opening remarks that you are raising the issue in line with our 'Raising Concerns (Whistleblowing Policy)'.  
  
12. The concern could be raised verbally or in writing. If you want to raise the matter in confidence, please say so at the outset so that appropriate arrangements can be made.

## **HOW WE WILL RESPOND**

13. Once you have told us of your concern, we will assess it and consider what action may be appropriate. This may involve an informal review, an internal inquiry or a more formal investigation. We will tell you who will be handling the matter, how you can contact them, and what further assistance we may need from you.

14.If you ask, we will write to you summarising your concern and setting out how we propose to handle it and provide a timetable for feedback. If we have misunderstood the concern or there is any information missing please let us know.

15.When you raise the concern it will be helpful to know how you think the matter might best be resolved. If you have any personal interest in the matter, we do ask that you tell us at the outset. If we think your concern falls more properly within our grievance, bullying and harassment or other relevant procedure, we will let you know.

16.Whenever possible, we will give you feedback on the outcome of any investigation. Please note, however, that we may not be able to tell you about the precise actions we take where this would infringe a duty of confidence we owe to another person.

You can raise your concern with any of the following Directors:

David Lane  
07540879150  
[david@terago.uk](mailto:david@terago.uk)

Rocky Fitzgerald  
07702256112  
[rocky@terago.uk](mailto:rocky@terago.uk)

John Cotton  
07796351968  
[john@dynamicarray.co.uk](mailto:john@dynamicarray.co.uk)

This Revision: 1<sup>st</sup> May 2024

**Rocky Fitz-Gerald**

Director

Next Review Due: 30<sup>th</sup> April 2025