

## Whistleblowing policy

### 1. What is whistleblowing

1.1 If you see or find out about something you think is wrong, illegal or in breach of ethical business practices at Origin which you deem could be in the public interest you should report it. You should go first to your line-manager or any other senior person. If you cannot or do not wish to do this for any reason you should follow this whistleblowing policy.

1.2 Raising concerns about wrongdoing can be one of the most difficult and challenging things to do in a work environment. Under this policy you may come forward with legitimate concerns without fear of being blamed or suffering any disadvantage for doing so.

### 2. What types of concerns can be raised by whistleblowers

2.1 The Public Interest Disclosure Act (PIDA) 1998 provides protection for workers who reasonably believe that they are acting in the public interest and where the disclosure falls into one of more of the following categories; • A criminal offence that has, is being, or is likely to be committed • Unauthorised or inappropriate disclosure, misuse or loss of confidential, personal and / or sensitive information • A miscarriage of justice • Risk or damage to the environment • A danger to the health and safety of employees or others • Attempts to suppress or hide information relating to wrongdoing.

2.2 The concern can be about an incident that happened in the past, is happening now or that you believe is likely in the future.

2.3 As long as you hold a reasonable belief that the information is true then you will be covered by the protection set out in this policy regardless of whether you are mistaken or the matter cannot be proved.

2.4 Whistleblowing does not cover concerns where there is no public interest element such as a concern about your own employment or related matters. To raise a concern in relation to this please refer to Surecam's grievance procedure.

### 3. Making your claim anonymously

3.1 It is possible for you to raise your claim anonymously if you wish to do so. However, this may mean that it is difficult to investigate fully if you haven't provided us with enough information.

3.2 We assure you that we will not tolerate any harassment or victimisation of staff and would encourage you to provide us with your name so we can fully investigate the matter. You may ask for confidentiality when doing so and we will respect this.

3.3 If you ask for confidentiality we will make every effort to protect your identity unless required to disclose it by law. If it becomes clear that we are unable to resolve the issue without revealing your identity we will discuss this with you, taking into account your views and our wider legal obligations before deciding whether or not to proceed with the investigation.

### 4. How to raise a concern internally

Step 1 4.1 Where possible you should raise any matter of concern, serious or otherwise with your line manager. This may be done either verbally or in writing.



Step 2 4.2 If you feel unable, for whatever reason, to raise the matter with your line manager, you may go to an Origin director.

Step 3 4.3 If these steps have been followed and you still feel you have concerns, or that they have not been addressed, or that you cannot discuss the matter with any of the above then you should contact – the Managing Director.

4.4 When raising your concern it is helpful for you to provide an explanation with as much detail as possible including dates and times of incidents, any eye witness details and any supporting documents that you have.

## 5. How to raise a concern externally

5.1 Where attempts to raise matters internally have been unsuccessful or, exceptionally, you feel you cannot raise their concerns internally, you may consider raising the matter with the relevant regulatory authority. For more advice on this you can contact the charity Protect on 020 7404 6609.

## 6. What happens next

6.1 The person who you raise the concern to will listen to and consider your concern in full and determine whether any action is needed. This may mean reporting it to a more senior member of staff or to the Managing Director.

6.2 We will try to keep you informed about the actions that we are taking in relation to the concern including how we propose to deal with the matter, whether we need further assistance from you, any action that is taken and the outcome of the investigation. However, we may not be able to provide you with much detail where we have a duty to keep the confidence of other people.

## 7. Support for whistleblowers

7.1 Whistleblowing may be very difficult. We will take every step to ensure we protect and support whistleblowers internally. However, we recognise that people may feel more comfortable seeking external support in this situation.

7.2 The independent charity Protect on 0207 404 6609 can provide support. Their lawyers can give you free confidential advice at any stage about how to raise a concern at work. They will also provide advice on the circumstances in which it may be appropriate for you to contact an outside body.