

1.0 Introduction

AEFM are committed to this policy. If you use this policy to raise a concern the Company gives its employees reassurance that they will not suffer any form of retribution, victimisation, or detriment.

The company will treat all employees concerns seriously and act accordingly to the policy. Employees will not be asked to prove anything. If a matter is requested to be treated in confidence the company will respect the request and only make disclosures with the employees' consent. The employee will be given feedback on any investigation and the company will always be sensitive to any concerns an employee may have as a result of any steps taken under the procedure.

2.0 Purpose

The company believes it has a duty to identify whistleblowing situations. The company encourages a culture of openness within the organisation and it believes it can help prevent malpractice. Prevention is better than cure. The policy must be read in conjunction with the company's Anti-Corruption and Bribery Policy.

By encouraging a culture of openness, the company wants to encourage employees to raise issues which concern whilst at work. Employees may be worried that by reporting such issues they will open themselves to victimisation or detriment, or risk of job security. Every employee has statutory protection if a concern is raised in the correct manner. The policy gives employees the opportunity and protection, providing the employee is acting in good faith.

If there is anything the Company should know then this procedure must be followed. By knowing about a malpractice, the Company will be in a good position to take the necessary steps to safeguard any interests and protection of the Company. This policy is different to general grievances and the grievances procedure must be then followed

3.0 Raising Concerns

The Company requires employees who have any concerns about malpractice that they must raise this to the Line Manager. There is no special procedure verbally or written is acceptable.

If the employee cannot approach their Line Manager, the issue must be raised to the Managing Director.

If the employee still has concerns or the matter is so serious that the employee cannot discuss with either two persons above this matter can be raised with any other Board member.

4.0 Company response

After a concern has been raised the Company will respond in a responsible and appropriate manner. This will involve internal enquiries but may be necessary to carry out an investigation, formal or informal dependent upon the concern.

The Company will keep the employee informed of any decisions taken and any outcomes of enquiries and investigations. However, the Company will not be able to inform the employee of any matters which would infringe the duty of confidentiality owed to other parties.

5.0 Raising Concerns Externally (Exceptional Cases)

If an employee feels they cannot raise the concern internally and the employee feels the information and allegations are true, issues can be raised with the appropriate regulator.

If an external Regulator is preferable, it must be one which falls in line with the Employment Rights Act 1996 Section 43F and The Public Interest Disclosure (Prescribed Persons) Order 1999 which include:-

- Audit Commission for England and Wales – Auditors appointed by the Commission to audit accounts of local Government and Health Service bodies
- Charity Commissioners for England and Wales
- Commissioners for Revenue and Customs
- Director of the Serious Fraud Office
- General Social Care Council
- Health and Safety Executive
- Local Authorities which are responsible for the enforcement of health and safety legislation
- Independent Policy Complaints Commission
- Information Commissioner
- Commission for Healthcare Audit & Inspection or the Commission for Social Care Inspection
- Office of Fair Trading
- Standards Board for England
- Treasury
- Secretary of State for Trade and Industry
- A person ('person A') carrying out functions, by virtue of legislation, relating to relevant failures falling within one or more matters within a description of matters in respect of which another person ('person B') is prescribed by the Public Interest Disclosure (Prescribed Persons) Order 1999, where person B was previously responsible for carrying out the same or substantially similar functions and has ceased to be responsible

Signed for, and on behalf of, AEFM Limited:



Andy Erskine
Chief Executive Officer

This Policy was reviewed on 31st May 2024