

WHISTLE-BLOWING POLICY

(Making a Disclosure in the Public Interest)

1. Introduction

Zitamar is committed to the highest standards of transparency and accountability. An important part of this is to enable employees to voice concerns in a responsible and effective manner.

Confidentiality

It is expected that no employee or contractor will disclose confidential information about the organisation's affairs. However, if an employee discovers information which they believe shows serious wrongdoing within Zitamar, it should be disclosed internally without fear of reprisal.

This policy applies to all employees, grantees, consultants, contractors, interns, and volunteers that provide supplies, services, or support, to Zitamar or promotes its work at any location in or out of the UK.

This policy is not designed to question financial or business decisions taken by the organisation nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures.

2. Scope of Policy

This policy is intended to cover concerns which are in the public interest and may initially be investigated

separately but might then lead to other procedures, e.g. disciplinary. These could include:

- Financial malpractice, bribery, impropriety, fraud, or corruption
- Failure to comply with a legal obligation
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Attempts to conceal any of these

3. Safeguards

● **Protection** - This policy is designed to offer protection to employees who disclose such concerns in good

faith and in the belief that the disclosure shows malpractice or impropriety.

● **Confidentiality** All disclosures will be treated in a sensitive and confidential manner.

● **Anonymous Allegations** will be considered depending on the seriousness of the issues raised, the credibility of the concern, and the likelihood of confirming the allegation from attributable sources.

- **Untrue Allegations** No action will be taken against an employee who makes an allegation in good faith which is not confirmed by the subsequent investigation. However, if someone makes malicious or vexatious allegations, disciplinary action may be taken against that person.

4. Procedures for Making a Disclosure

The employee who receives and takes note of the complaint of malpractice, must pass the information to the appropriate designated investigating officer:

1. Complaints of malpractice will be investigated by the appropriate manager unless the complaint is against the manager or is related to the actions of the manager. If so, the complaint should be referred to the Executive Director.
2. Complaints against the Executive Director should be passed to the Chairman of the Board of Trustees who will nominate an appropriate internal / external investigating officer.
3. The complainant has the right to bypass the line management structure and take their complaint directly to the Chairman. The Chairman has the right to refer the complaint back to management if he/she feels that the management without any conflict of interest can more appropriately investigate the complaint.

Criminal Activity

If there is evidence of criminal activity, the investigating officer should inform the police. Zitamar will ensure that any internal investigation does not hinder a formal police investigation.

5. Time Scales

Due to the varied nature of these sorts of complaints, which may involve internal / external investigators and/ or the police, it is not possible to lay down precise time scales for such investigations.

The investigating officer should ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations.

The investigating officer should send a written acknowledgement of the concern to the complainant and thereafter report back to them in writing the outcome of the investigation and the proposed action. If the investigation is a prolonged one, the investigating officer should inform the complainant in writing re the progress and when it is likely to be concluded.

6. Investigating Procedure

The investigating officer should follow these steps:

1. Obtain full details and clarifications of the complaint.
2. The investigating officer should inform the member of staff against whom the complaint is made as soon as possible.

3. The member of staff will be informed of their right to be accompanied by a work colleague at any future interview or hearing held under the provision of these procedures. (At the discretion of the investigating officer and dependent on the circumstances of the complaint an alternative representative may be allowed, e.g. the individual's legal representative.)
4. The investigating officer should consult with the Executive Director/Chairman if appropriate and consider the involvement of the Organisation's auditors.
5. The allegations should be fully investigated by the investigating officer with the assistance of other individuals / bodies as appropriate.
6. A judgement concerning the complaint and its validity will be made by the investigating officer. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement. The report will be passed to the Executive Director/Chair.
7. The Executive Director/Chair will decide what action to take. If the complaint is shown to be justified, then they will invoke the disciplinary or other appropriate organisational procedures.
8. The complainant should be kept informed of the progress of the investigations and, if appropriate, of the outcome.
9. If appropriate, a copy of the outcomes will be used to review Zitamar's procedures. If the complainant is not satisfied that their concern is being properly dealt with by the investigating officer, they have the right to raise it in confidence with the Executive Director /Chairman or one of the designated persons described above. If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcome of the investigation, Zitamar recognises the lawful rights of employees and ex-employees to make disclosures to prescribed persons or body.

This policy may be reviewed and amended by Zitamar from time to time



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