

Whistle Blowing Policy

Introduction

Malpractice within Moore Insight (the Company) is taken very seriously. The Company therefore encourages all staff to raise genuine concerns about possible malpractice at the earliest practicable stage.

This policy applies to all persons working for, or on behalf of, Moore Insight in any capacity, referred to as “staff” within this policy. This includes employees at all levels, Directors, agency workers, associate consultants, contractors, third-party representatives and business partners. This policy does not form part of any contract of employment for those mentioned above and we may amend it at any time.

This policy gives effect to the Public Interest Disclosure Act 1998 (the Act) and is intended to provide safeguards to enable staff to raise concerns. The aim is to provide a rapid mechanism under which genuine concerns can be raised internally and, if necessary, externally without fear of adverse repercussions. It is also intended to promote a culture of openness and a shared sense of integrity by inviting all staff to act responsibly in order to uphold the reputation of the Company.

The Act protects an employee who reports a concern to their employer, prescribed persons (such as HMRC or the Health and Safety Executive) or some other person in prescribed circumstances. In order to qualify for protection, the disclosure must be made in good faith and the employee must also reasonably believe that any allegations are substantially true.

This policy and associated procedure seeks to balance the need to provide safeguards for staff who raise genuine concerns against the protection of other staff and the Company against uninformed or vexatious allegations.

If you are aggrieved about your personal position rather than concerned about malpractice, it is more appropriate to use the Company’s grievance procedure.

Disclosure

If you have concerns about possible malpractice, you should as soon as practicable, disclose them in confidence to your Line Manager. If you feel unable to raise the matter with your Line Manager, you should contact a Director.

On receipt of the disclosure, the Directors will assess what action should be taken. You will be advised whether your further assistance will be needed. You may be asked how you think the matter might best be resolved. If you have a personal interest in the matter, you should inform the Company of this at the outset. If your concern falls more properly within the Grievance Procedure, you will be advised accordingly.

It may be necessary for you to be interviewed to obtain as much information as possible about the grounds of your disclosure and to consult you about further steps which could be taken. You may be accompanied by a work colleague at the interview.

Further Steps

As soon as practicable the Directors will recommend what further steps should be taken. Such recommendations may (without limitation) include:

- that the matter should be investigated internally / or by external auditors or investigators;
- that the matter should be reported to the appropriate public authority;
- that the matter should be reported to the police;
- that you should be given the opportunity to seek redress through the Company’s grievance or complaints procedures or through an appeal under the Company’s disciplinary procedures.

The grounds on which the Directors of the Company may recommend that no further action should be taken by the Company are:

- that the Company is satisfied that you do not have a reasonable belief that malpractice within the meaning of this procedure has occurred, is occurring or is likely to occur; or
- that the Company is satisfied you are not acting in good faith; or
- that the matter concerned is already the subject of legal proceedings, or has already been referred to the appropriate authority; or
- that the matter is already (or has already been) the subject of proceedings under one of the Company's other procedures.

Any recommendations made under this procedure will be made by the Directors (unless it is alleged that a Director is involved in the alleged malpractice or unless there are other reasonable grounds for not doing so), in which case the recommendations will be made to another member of the Board. In any case, the recommendations will be made without revealing your identity, save as provided below. The Board will take all steps within its power to ensure that they are implemented except to the extent that, in its view, there are good reasons for not doing so.

Safeguards

Any report or recommendations by the Board in relation to the matter will not identify you, unless:

- you otherwise consent in writing; or
- there are grounds to believe you have acted maliciously; or
- there is under a legal obligation to do so; or
- the information is already in the public domain; or
- on a strictly confidential basis to a professionally qualified lawyer to obtain legal advice.

Any documentation (including paper and electronic files) kept by the Board relating to the matter will be kept secure, so that as far as practicable only the Directors shall have access to. As far as practicable, any documentation prepared by the Board will not reveal the identity of you as the discloser.

Where you involve a work colleague in this procedure, you will be under obligation to use all reasonable endeavours to ensure that your work colleague keeps this matter strictly confidential save as permitted under this procedure, as required by law or under such times as it comes into the public domain.

You will not be required by the Company, without your consent, to participate in any enquiry or investigation into the matter unless there are grounds to believe that you may have been involved in misconduct or malpractice.

Where you participate in any such enquiry or investigation, that participation will usually be required to be on an open rather than on a confidential basis, although the obligations of the Directors will remain in relation to your identity as the original discloser of information under this procedure.

The Directors of the Company will not, and will use all reasonable endeavours to ensure that its staff do not, subject you to any detrimental treatment, on the grounds of your disclosure of information under this procedure. Any complaints of such treatment should be reported directly to the Directors. If you wish the Directors to take action in relation to such complaints, you may be asked to consent in writing to the Directors revealing your identity for the purposes of any such action.

External Disclosure

Under the Act, you may make an external disclosure to prescribed persons. Such disclosures must be made in good faith and you must reasonably believe both that the allegations are substantially true and that the malpractice falls within the area for which the prescribed person is responsible.

Whilst it is the hope of the Company that its internal procedure will provide you with the most effective and appropriate method of proceeding, the Company recognises that if you have reasonable grounds for believing that the Management of the Company is, or was, involved in the alleged malpractice or that you will be subjected to a detriment as a result of making the disclosure, you may wish to make a disclosure to a prescribed person. In these circumstances, the Directors of the Company would be happy to advise you when taking such action.

Protection Against Disciplinary Action

No disciplinary action will be taken against you on the grounds of your disclosure made in accordance with this procedure. This will not prevent the Company from bringing disciplinary action in cases where there are grounds to believe that a disclosure has been made maliciously or vexatiously. Disciplinary action may also be brought where an external disclosure is made in breach of this procedure without reasonable grounds or inappropriately to a public authority.

Contacts

If there are any questions regarding this policy or if you would like to contact us, please send an email to Info@moore-insight.com.

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