



WHISTLEBLOWING POLICY

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This Whistleblowing Policy is designed to ensure that employees are able to raise issues and concerns where they genuinely believe something is going wrong in the Society and where they are not able to do so with their line manager.

Individual grievances or incidents of harassment or discrimination etc can be effectively addressed under the relevant existing policies and procedures. The following are examples of matters, which may be raised under this policy by any employee with a genuine belief that the disclosure will show:

- that a criminal offence has been committed, is being committed or is likely to be committed. This may include issues such as suspected fraud, financial irregularities, theft, bribery, corruption, dishonesty, involvement in or being party to criminal activities
- that a person is failing, has failed or is likely to fail to comply with a legal obligation to which he/she is subject
- that a miscarriage of justice has occurred, is occurring or is likely to occur
- that the health & safety of any individual has been, is being or is likely to be damaged. This must be a greater danger than is associated with the normal use of any processes or products, which can be addressed under normal Health & Safety procedures.
- that there is or has been a deliberate concealing of matters falling within the scope of issues listed, or that matters are likely to be deliberately concealed.

The Society is firmly committed to maintaining the highest ethical standards in all its activities. It regards impropriety and malpractice as serious matters and seeks to prevent them arising. Where genuine concerns do arise, we seek to ensure there are appropriate processes in place, which will allow any employee to raise them in a proper manner and in good faith and which ensures the issues are addressed.

Management of the Society take seriously the need to operate in a climate of openness, in which any member of staff can raise legitimate concerns without fear of reprisal. Management will also seek to ensure that the highest standards of conduct are observed and to this end, will develop, maintain and communicate relevant policies and procedures across the business. It has to be clearly understood that genuine and legitimate concerns about malpractice will be treated seriously.

Any malicious, false or deliberately misleading allegations will be treated as serious misconduct and may result in dismissal.

Employees raising genuine concerns about impropriety or malpractice in accordance with this policy will not face any detrimental consequences nor will they be subject to harassment or victimisation.

This policy is intended to help everyone act in the Society's best interest and to establish the Society's commitment to attaining high standards of conduct

and integrity. All staff and Management are assured that it is both safe and acceptable to raise legitimate concerns under this procedure.

Whistle blowing Procedures

These procedures cover the disclosures made by an employee relative to suspected allegations of fraud, financial irregularities, corruption, bribery, dishonesty, involvement in or being party to criminal activities, failing to comply with a legal obligation, a miscarriage of justice, creating or ignoring a serious risk to health and safety.

No employee will be disciplined for raising a concern so long as he/she has followed this procedure, has acted in good faith and not for personal gain or out of personal motive. Using these procedures knowingly to make false or malicious allegations will be regarded as serious misconduct and may lead to dismissal.

The procedures *cannot* be used by employees for raising routine grievances about their personal employment situation, matters relating to sexual or racial discrimination. The specific policies and procedures for dealing with these matters are outlined in the Staff Handbook.

Matters raised under this procedure will be treated in strictest confidence and will be investigated discreetly. The nature of allegations and name(s) of those allegedly implicated will not be made public. All managers and employees have an obligation to observe this confidentiality. Breaches of this confidentiality will be viewed as serious misconduct and may result in dismissal.

Although it cannot be absolutely guaranteed in every circumstance, all efforts will be made to preserve the anonymity of the person raising concerns or making allegations. Anonymous allegations will not be investigated under the procedures as the standard of evidence will be insufficient.

What you should do

In the first instance you should raise your concerns with your line manager. If this is not possible because of potential involvement, the following procedure should be used.

An employee who has a legitimate concern about malpractice, which falls within the scope of this procedure, should raise the matter with the appropriate *designated officer* (see *list attached*). While contact may initially be made verbally, it will normally be required that the allegation is made in writing.

This designated officer should firstly acknowledge receipt of the complaint. This should be done in writing to the employee's home address within 48 hours.

The designated officer will conduct appropriate investigation and will do so discreetly and as speedily as circumstances permit. The employee raising the concern will be kept advised of the progress of the investigation and likely timescale for completion. Written correspondence to the employee will normally be sent to the home address unless otherwise agreed.

The designated officer will keep the employee advised of the outcome of the investigation and any proposed action. In the event of serious malpractice, information will be passed to the relevant Senior Manager and may also be passed to the relevant official bodies (police, tax, environmental health, etc.).

If the employee is not satisfied that the concern is being processed or investigated correctly by the designated officer, the matter should be raised with: the Head of People & Performance on 0131 335 4440.

Designated Officers	Type of concern or allegation	Phone number
Jim McFedries Head of Profit Protection	<i>Fraud, theft, extortion, fictitious or false claims for cash or stock, false accounting etc.</i>	0131 335 4460
Susie Jardine Head of Internal Audit		0131 335 4420
Janet Andrews Senior People & Performance Business Partner	<i>Any other concerns or serious allegations contravening the law or regulations</i>	0131 335 4446
Susie Jardine Head of Internal Audit		0131 335 4420
Public Concern at Work (PCW is a charity which helps employees who expose serious malpractice and provides advice which is free and confidential.)	<i>If you are unable to raise your concerns internally</i>	020 7404 6609

Appeals

If at the conclusion of the investigation by the designated officer the employee is not satisfied with the outcome, he/she will have the right to appeal to: the Head of People & Performance on 0131 335 4440.