



By appointment to  
H.M. Queen Elizabeth  
Purveyors of  
Fire Protection Systems



## WHISTLE-BLOWING POLICY

B.B.C Fire Protection Limited (01454397) T/A BBC Fire & Security 'The Company', is committed to ensuring that as an Employee, you are able to raise concerns you may have about the company or serious malpractice associated with it.

This policy has been drawn up to ensure you raise these concerns properly and to ensure that mechanisms exist whereby any issues you do raise can be addressed quickly, effectively and professionally.

### PURPOSE

The objective of the Whistle-Blowing Policy is to prevent malpractice by encouraging a culture of openness. Employees who are concerned about victimisation or detriment i.e. risks to job security as a result of raising a concern, are protected by law if they raise their concerns the correct way. The Public Interest Disclosure Act 1998 (PIDA) prevents the Employee from suffering a detriment of having their employment terminated due to 'whistle-blowing'. Provided you are acting in good faith and reasonably believe in the alleged wrongdoing, you will not suffer any detriment even if your concern proves to be unfounded.

This Policy is applicable to all company Employees.

The HR Department within the Company are able to advise about the implementation of the Whistle-Blowing Policy and Procedure, should you have any questions.

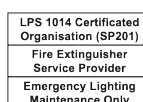
### DISCLOSURE OF INFORMATION

Should you believe that the Company is involved in any form of wrong doing relating to the matters such as the below, then you should use the procedure outlined in this policy:

- A criminal offence has been committed, is being committed or is likely to be committed
- Disregard for legislation, particularly in relation to health and safety at work and damage to the environment
- Miscarriage of justice
- Suspected Fraud and corruption
- Abuse of client/customer
- Showing undue favour over a contractual matter or to a job applicant
- A breach of any code of conduct or protocol
- Financial malpractice
- Deliberate concealment of information relating to any of the above

### BBC Fire & Security

Registered Name: B.B.C Fire Protection Limited  
Registered Office: 20 Grosvenor Place, London, SW1X 7HN  
Registered in England & Wales  
Company Registration No. 01454397  
Vat Registration No. 342 4279 63



## **PROCEDURE**

### **STEP 1**

Should you have a concern about malpractice, you should, in the first instance, raise it with your Line Manager.

This can be done verbally or in writing if preferred. The Line Manager will investigate the issue following the procedure set out below.

### **STEP 2**

Should you still have continuing concerns following the response at Step 1, or the matter is so serious you feel this cannot be raised with your Line Manager; you should prepare a written statement detailing your concerns.

This should be forwarded with the Line Managers' response, if appropriate, to the functional Director.

## **RESPONSE**

When the concern is raised, you may be asked how you think the matter might best be resolved. If you have any personal interest in the matter, you must declare this at the outset.

If your concern falls more properly within the Grievance Procedure, you will be informed of this at the earliest possible time.

The investigation will involve making enquiries to ascertain the relevant facts.

The decision as to who will make the initial enquiries depends on, amongst other factors, the seriousness of the allegations and the technical knowledge required to make a judgement on any findings.

The Manager informed of the concern initially will write to you within 10 working days to confirm:

- The nature of the concern
- The steps the Company will take to progress the matter
- Who is making further enquiries
- How you can contact the person making the enquiries
- Whether you may be needed to provide further assistance

After initial enquiries are made, the person who has carried out the investigation and any other relevant Employees will decide on the appropriate action to take.

If the concern is found to be justified, you will be informed of the action to be taken, the timescale and the person responsible.

If the concern is found not to be justified, you will be informed of the reasons in writing.

The HR Department will confirm the response to the initial enquiries in writing. It may not be possible to disclose the precise action taken where this would infringe a duty of confidence owed by the company to another Employee or person associated with the Company.

The HR Department will maintain a log indicating what concerns have been raised, by whom, when and the result of any investigations.

If you are dissatisfied

If you are unhappy with the outcome or the manner in which your concern is managed, you may inform the HR Department in writing or verbally, who will then decide the best course of action.

## **RIGHT TO BE ACCOMPANIED**

You are entitled to be accompanied by a work colleague or Trade Union Representative at any meeting to discuss your concerns, at any stage of the procedure.

## **RAISING A CONCERN**

The company is committed to dealing quickly and effectively with concerns raised through this procedure. It is intended that this Policy gives Employees the reassurance needed to raise such matters in confidence, and that information given will be treated appropriately and a response given as soon as possible.

The company would also rather have any matter of concern to be raised than not at all. Providing you are acting in good faith and have evidence to back up any concerns.

We will investigate anonymous concerns but encourage Employee's to tell us who you are whenever possible as anonymous concerns are more difficult to investigate. Without the provision of information and we cannot protect your position or give you any feedback if we haven't got any details.

### **CONFIDENTIALITY**

All Employees have a duty of confidentiality to the Company and the Company has a duty of confidentiality to its Employees. When considering making a disclosure of confidential information, you should seek guidance from the HR Department.

If you ask for a matter to be treated in confidence the company, will where possible, respect such a request.

### **DISCIPLINARY ACTION**

If it becomes clear that you have not invoked the procedure in good faith, but for example, for malicious reasons or to pursue a personal grudge, this will constitute misconduct and will be dealt with in accordance with the Company's Disciplinary Procedure.

### **REFERRAL**

There may be matters that cannot be dealt with internally and external authorities will need to become involved. Should this become necessary the company reserves the right to make such a referral without your consent.

Signature:		Date:	1 <sup>st</sup> April 2019
Name:	Rob Flinn	Position:	Chief Executive Officer

The signatory review and above applies to the full suite of BBC Fire & Security Policies and Procedures.