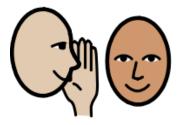


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Whistleblowing Policy

1. Policy Purpose

The purpose of this policy is to outline ways in which all staff can express concerns about malpractice / wrongdoing, and to encourage staff to raise these at an early stage in the right way. Whatever the nature of the concern, all staff are reminded that it is safe and acceptable to speak up.

2. Policy Statement

Whistleblowing is the name given to the act of the disclosure of information to the employer or the relevant authority by an individual who knows, or suspects, that the company is responsible for, or has taken part in some wrongdoing.

Those making qualifying disclosures are protected against dismissal or detriment by The Public Interest Disclosure Act 1998.

Widgit is committed to achieving the highest possible standards of service and the highest possible ethical standards in public life and in all of its practices.

3. Qualifying Disclosures

Certain disclosures are prescribed by law as 'qualifying disclosures'. A 'qualifying disclosure' means a disclosure of information that the employee genuinely and reasonably believes is in the public interest, and shows that the company has committed a 'relevant failure' by:

- Committing a criminal offence.
- Failing to comply with a legal obligation.
- A miscarriage of justice.
- Endangering the health and safety of an individual.
- Causing environmental damage.
- Concealing any information relating to the above.

These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. The company will take any concerns that you may raise relating to the above matters very seriously.

Staff must reasonably believe that the disclosure is 'in the public interest'. We encourage you to use the procedure to raise any such concerns.

4. Procedure

In the first instance, you should report any concerns you may have to your line manager – or a member of the management team with whom you feel comfortable – who will treat the matter in complete confidence. If you are not satisfied with the explanation or reason given to you, you should raise the matter with the appropriate official organisation or regulatory body.

If you do not report your concerns to your line manager/ member of the management team, you should take them direct to the appropriate organisation or body.

5. Support

Throughout the process you will receive full support from your line manager. Your concerns will be taken seriously, and Widgit will do all it can to help you throughout the investigation.

6. Harassment or Victimisation

Bullying, harassment or any other detrimental treatment afforded to a colleague who has made a qualifying disclosure is unacceptable. Anyone found to have acted in such a manner will be subject to disciplinary action.

7. Link to Anti Bribery

Widgit recognises that bribery and corruption are both serious matters and may be the subject of whistleblowing activity.

8. Policy Review

This policy will be reviewed every **3 years**, or sooner if changes in legislation occur or new best practice evidence becomes available.

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