

## Whistle blowing Policy - February 2022

### About this policy

This policy applies to everyone who works for Digital Modus, or who acts on behalf of Digital Modus. All team members have a role in promoting and ensuring we meet our obligations. They are, to uphold the law and to deal equitably and ethically with our Customers, Suppliers and Partners. We all have a personal responsibility to comply with the policy and to ensure, as far as possible, that others inside and outside of our organisation do the same. You should not need to feel victimised for pointing out when others are doing things that aren't right.

1. We are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.
2. This policy covers all employees, officers, consultants, contractors, casual workers and agency workers.

### What is whistleblowing?

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, general corruption including - facilitation of tax evasion, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

### How to raise a concern

1. We hope that in many cases you will be able to raise any concerns with your manager. However, where you prefer not to raise it with your manager for any reason, you should contact a Director.
2. We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

## Confidentiality

1. We hope that staff will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

## External disclosures

1. The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.
2. The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external. Protect operates a confidential helpline. Their contact details are at the end of this policy.

## Protection and support for whistleblowers

1. We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.
2. All colleagues are legally protected if they make a qualifying disclosure.
3. Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the Head of People immediately.
4. You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action.
5. However, if we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.
6. Protect operates a confidential helpline, contact details below

Website: <https://protect-advice.org.uk/pcawchangesnametoprotect/>

Helpline: 0203 117 2520

E-mail: [whistle@pcaw.co.uk](mailto:whistle@pcaw.co.uk)

## Document Information

### Document Control

Version	Date	Author	Comments
0.1	1st February 2022	Nick Howes	Initial Draft
0.2	7th February 2022	Nick Howes	Changes following HR Consulting review
x.x	31st January 2023	TBD	Annual Review

### Distribution List

Name	Role
Staff	All Staff employed by Digital Modus must-read.
Contractors	All people involved on behalf of a subcontractor contracting with Digital Modus must-read.
Suppliers	Shared with Suppliers as part of Digital Modus supplier onboarding.
Customers	Shared with all Customers on request.