

## Whistle blowing policy

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### Introduction

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This policy sets out the rights and responsibilities of the employees of Assura plc when raising issues of concern; providing staff with guidance when seeking to raise legitimate matters of concern.

The aim should always be for employee's concerns to be resolved informally. Concerns should be raised as early as possible. Every incident will be treated seriously, sensitively and will be fully investigated.

Examples of issues that may fall within the scope of this policy include; failure to comply with legal duty, miscarriage of justice or actions likely to pose a danger to the health and safety of employees, tenants and advisors of the Company.

### Informal procedure

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In the first instance, you should speak to your line manager or a Director. Where appropriate, action should be taken promptly and you will be notified of the action taken.

Where action is not appropriate, you will be given an explanation by your line manager or Director. You will be advised of any further action necessary.

### Formal procedure

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Where an informal approach is ineffective, or unsatisfactory, you should raise the matter formally through your line manager or the Head of Legal.

This should be done clearly, in writing or via a meeting with your line manager or the Head of Legal. You have the right to be accompanied by a work colleague or trade union representative.

The line manager to whom your concern is reported will be responsible for conducting an appropriate investigation and ensuring any action identified is implemented promptly and effectively.

The line manager should provide a written response to you within five working days of the issue being raised (this time scale can be extended by mutual agreement of all parties to ensure a full and fair investigation).

If you remain dissatisfied, you should contact the Chief Executive (where the issue cannot be dealt with objectively by any other manager of the Company). All managers will always take concerns seriously.

Raising a concern can be a difficult experience. You should seek advice from your line manager where appropriate.

You also have the right to seek guidance and support from your professional organisation, trade union or from statutory bodies. If you are contemplating making a disclosure you are advised to seek guidance from professional or representative bodies or to discuss the matters with your colleagues before taking any issues further.

If you choose to ignore the internal reporting procedure, it will be deemed that you are calling into question the whole ethics of the Company and therefore an approach to a regulatory or other body cannot be taken lightly.

You are contractually obliged to comply with our procedures, which are in place to protect us and our employees. Any failure to comply with these requirements will be treated as a breach of your employment contract and will result in disciplinary action, which may lead to dismissal.

It is expected however, that adherence to this policy will ensure that any concerns raised can be addressed and dealt with, without the need for a wider disclosure.

### Raising of malicious concerns / harassment

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If you express your views in accordance with this policy, you will not suffer any detriment or any forms of retribution where the concern is legitimate, however, we will not condone abuse of this policy.

If following an investigation, it is our opinion that you raised the concern for malicious reasons, you may be subject to formal disciplinary action which could result in your dismissal.

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We will not tolerate the harassment or victimisation of anyone raising a concern under this policy and such actions detected will be dealt with under the disciplinary procedure and may result in dismissal.

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### Confidentiality

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We recognise that you may wish to raise concerns in confidence under this policy.

Under normal circumstance, we will not disclose your identity without consent, however, in some cases this may not be possible e.g. if your evidence is needed in court.

Any unauthorised disclosure of personal information about any tenant/third party will be regarded as a serious matter; even where you may think you were acting in the best interests of the tenant/third party.

You have a duty of confidentiality and loyalty to us, however, in some circumstances you may feel that a disclosure needs to be made in the public interest. Such a justification will need to be defended and if you consider such an action, you should first seek advice via a trade union, professional or regulatory body.

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[See EXPOLINK Letter – Appendix 1](#)

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