



Title	Whistleblowing Policy	Next Review Date	01/08/2023
Authorised by	Elizabeth Andrews	Owning department	PAC
Version	2.0		

1 Purpose of the Policy:

All organisations face the risk of things going wrong or of unknowingly harbouring malpractice. TWI takes malpractice very seriously and is committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards too.

Whistle Blowing is one of the effective contemporary managerial techniques used for prevention / detection of the likely attempt(s) of defrauding the organization and other malpractices by its employees, customers and/or other parties. It mobilizes the employees to communicate their suspicions and reasonable doubts to the management about malicious activities without fear and prejudice.

This policy is aimed to facilitate the employees to voice their concerns and provide an appropriate pre identified authority to report any suspicious or undesired event or activity which are against the policies of TWI or may have an adverse impact on the employees, partners, customers, business or goodwill of the organization or the society at large.

We encourage open communication from all those who work with us and we want everyone to feel secure about raising concerns. All staff have protection under whistleblowing laws if they raise concerns in the correct way. This policy is designed to give staff that opportunity and protection. It does not matter if an individual who raises a concern is mistaken about it—staff do not have to prove anything about the allegation they are making but they must reasonably believe that the disclosure is made in the public interest and that the information they have tends to show some malpractice.

This policy supports TWI Value of “Taking Responsibility”

2 Scope:

This policy applies to all employees, workers, officers and anyone else who has a contract to carry out work for the Company personally. There is a difference between whistleblowing and raising a grievance.

This policy does not set out the procedure that applies to general grievances. If you have a complaint about your own personal circumstances, then you should use the company Grievance Procedure instead.

3 Policy:

TWI is committed to ensuring that all disclosures raised will be dealt with appropriately, consistently, fairly and professionally. Furthermore TWI is committed to good practice and



high standards and to being supportive to staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

Any individual raising a genuine concern must not suffer any detriment as a result of doing so. If you believe that you have suffered such treatment, you should inform the Head of HR immediately. If the matter is not dealt with to your satisfaction, you should raise it formally using the Grievance Procedure.

No member of staff must threaten or retaliate against an individual who has raised a concern and we will not tolerate any such harassment or victimisation. Any person involved in such conduct may be subject to disciplinary action.

However, to ensure the protection of all our staff, those who raise a concern frivolously, maliciously and/or for personal gain and/or make an allegation they do not reasonably believe to be true and/or made in the public interest will also be liable to disciplinary action.

This procedure does not give contractual rights to individual employees, workers or contractors. The Company reserves the right to alter any of its terms at any time although we will notify you in writing of any changes.

All concerns raised will be treated in confidence and every effort will be made not to reveal your identity if that is your wish. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of a disclosure without your help, so you may be asked to come forward as a witness.

TWI hopes that all staff will feel able to voice their concerns openly under this policy. Although a concern may be raised anonymously, we encourage you give your name when reporting your concern whenever possible. If this is not done, it will be much more difficult for us to protect your position or to give feedback on the outcome of investigations. Concerns that are expressed completely anonymously are also much less powerful and are difficult to investigate.

4 Procedures for TWI Staff

If an employee discloses information but chooses not to remain anonymous, where reasonably practicable, TWI will keep their identity confidential. In this situation, TWI will aim, wherever possible, to keep the employee informed of the progress of the investigation and its likely timescales.

If any employee is not happy with the way in which their concern has been handled, they can raise it with the Chief Executive of TWI.

i) How to raise a concern internally

As a first step, individuals should raise concerns with their line manager although this may depend on the seriousness and sensitivity of the issues and individuals involved. If for whatever reason you cannot/do not feel comfortable raising concerns with your manager, you should instead raise the concern with the Head of People and Culture.

If the issue involves the Head of People and Culture, then the employee can approach the Chief Executive (Line Manager) who will appoint an independent person to take the matter forward.



Although individuals are not expected to prove the truth of their concern beyond doubt or provide evidence, you will generally need to provide, as a minimum, details of the nature of the concern and why you believe it to be true, and the background and history of the concern (giving relevant dates where possible).

ii) Responding to concerns raised

The Line Manager or the Head of People and Culture will arrange a meeting as soon possible to discuss the concern raised. You may bring a colleague to any meeting that takes place. The companion must respect the confidentiality of the disclosure and any subsequent investigation. We may ask you for further information about the concern raised, either at this meeting or at a later stage.

After the meeting, we will decide how to respond. If it is decided that further investigation is required the Head of People and Culture will nominate an independent person to investigate the facts. We will endeavour to complete investigations within a reasonable time.

Once the facts have been gathered, the investigator will write a report for the Head of People and Culture. The Head of people and Culture will write a formal response to the concerns you raised. We aim to complete the process within 28 days from which the issue is raised.

We cannot inform you of any matters which would infringe any duty of confidentiality owed to others.

iii) Raising a concern externally (exceptional cases)

The main purpose of this policy is to give all our staff the opportunity and protection they need to raise concerns internally. We would expect that in almost all cases raising concerns internally would be the most appropriate course of action.

If for any reason you do not feel you can raise the concern internally, TWI has an established 3rd party provider (NAVEX Global®) to whom individuals can make anonymous reports of suspected work place wrong doing via their whistleblowing hotline or web reporting system.

Employees can access NAVEX Global® by:

- Their live 24/7 Freephone number. (Provided at the end of policy)
- Their web reporting system www.expolink.co.uk/foremployees.

iv) External Reporting Procedure

- (1) The individual calls the hotline in their resident country to ensure local legislation compliance with the option to remain anonymous.
- (2) The call handler will explain the process to the individual and take down detailed notes of the complaint.
- (3) At the end of the call, the call handler will summarise back to the caller his/her understanding of the report made to ensure accuracy and clear understanding of the issue raised.
- (4) If the individual has asked to remain anonymous then the call handler will provide them with a unique passcode which relates directly to the report and request that the employee call back in 28 days. The 28 days is to allow TWI time to initially investigate any allegation and feedback to NAVEX Global®.
- (5) On completion of the call, a typed report is prepared and the standard response time for sending the completed report across to the authorised recipients within 2 hours of receipt of the call.



- (6) Upon receipt of the report, TWI will investigate the allegation promptly and appropriately.
 - (a) The Head of People and Culture (involving everyone except the Chief Executive or the Head of People and Culture, in such cases the process will be initiated by the Chair of TWI Council) will appoint an independent investigator to investigate the concerns raised.
 - (b) The Independent investigator will keep gather the facts relating to the concerns raised. This may involve interviewing persons connected to the allegations. The independent investigator will remain as confidential as possible about the allegations.
 - (c) The Independent investigator will write a report of their findings within 21 days of the original date of notification and provide them to the Head of People and Culture (the Chief Executive or the Chair of TWI Council).
 - (d) The Head of People and Culture or the Chair of TWI council will respond on Navex with the reply within 28 days of the issue being raised.

Please note that allegations involving the Chief Executive or the Head of People and Culture will be directed to the Chair of Council to appoint the appropriate independent person to investigate the issue raised.

5 Referencing

- Public Interest Disclosure Act 1998 (PIDA)
(<https://www.legislation.gov.uk/ukpga/1998/23/contents>)
- Employment Rights Act 1996
(<https://www.legislation.gov.uk/ukpga/1996/18/part/IVA>)
- Whistleblowing for employees, <https://www.gov.uk/whistleblowing>

6 Definitions:

- 1) **Whistleblowing:** whistleblowing is where an individual has a concern about a danger or illegality that has a public interest aspect to it, for example because it threatens customers, third parties or the public generally; but
- 2) **Grievance:** a grievance is a complaint that generally relates to an individual's own employment position or personal circumstances at work.
- 3) **Qualifying disclosure:** A qualifying disclosure means any disclosure of information relating to an individual's belief that one or more of the following is either happening, has taken place or is likely to happen in the future:
 - A criminal offence.
 - Breach of a legal obligation.
 - Bribery.
 - A miscarriage of justice.
 - Danger to the health and safety of an individual.
 - Damage to the environment.
 - The deliberate concealment of information concerning any of the matters listed above



7 International Freephone number to raise concern externally:

Country	Access Code (Dialling Step 1)	Dialling Instructions
Bahrain	Bahrain: 800-00-001 military call centres: 800-000-05 military onboard cell phones: 800-000-00	(844) 539-2221
Greece	00-800-1311	(844) 539-2221
India	000-117	(844) 539-2221
Indonesia	001-801-10	(844) 539-2221
Malaysia	1-800-80-0011	(844) 539-2221
Pakistan	800-0109	(844) 539-2221
Singapore	SingTel: 800-011-1111 StarHub: 800-001-0001	(844) 539-2221
Thailand	1-800-0001-33	(844) 539-2221
Turkey	0811-288-0001	(844) 539-2221
United Arab Emirates	U.A.E.: 8000-021 Military-USO and cellular: 8000-061 du: 8000-555-66	(844) 539-2221
United Kingdom	n/a	0800 060 8761