

WHISTLEBLOWING POLICY

Policy Statement: McSence Group believes that effective communication between employees, contractors, sub-contractors, volunteers, management, and supervisory staff at all levels throughout the organisation promotes better work practice. McSence seeks to conduct business with integrity, trust, and honesty at all times where we acknowledge that all organisations face the risk of their activities going wrong from time to time, or of unknowingly harbouring malpractice. We believe we have a duty of care in taking the appropriate measures to identify such situations and attempt to remedy them. On this basis, employees, contractors, sub-contractors, volunteers, management, and supervisory staff are encouraged to raise genuine concerns about malpractice in the workplace without fear of reprisals and McSence will protect them from victimisation and dismissal. McSence undertakes to act in accordance with UK legislation on disclosure of malpractice in the workplace and to take steps to protect its workers from detrimental treatment or dismissal if they raise concerns in good faith.

All Employees: This policy applies to all persons working for or on our behalf of the McSence Group of Companies which includes the subsidiary companies - *McSence Communication Ltd, McSence Ltd, McSence Services Ltd & McSence Workspace Ltd* in any capacity including but not limited to:

- All employees at all levels, prospective employees, agency workers, seconded workers, temporary workers, contractors/sub-contractors, clients, agents, external consultants, volunteers, members of the public, group's supply chain, third-party representatives and/or business partners who will be referred to in our Group policies as "all employees".

The Workplace: This policy applies to all persons working for or on our behalf of the McSence Group of Companies in any capacity at the workplace(s) as defined below which includes but not limited to:

- McSence Premises, Offices, Units, Business Park, Client's Premises, External Meeting Places, Customers' Homes, Gardens, Sheltered Housing, Whilst On-Call, On-Duty, Emergency Cover, Working from Home including On-Line Meetings, Whilst Driving in Company Time, Working Public Areas (café's, trains, coffee shops, buses etc) and will be referred to throughout this policy as "the workplace".

Purpose: The aim of the above to protect society by encouraging workplace whistleblowing where they can advise individuals and businesses as follows:

- Whistleblowing dilemmas at work
- Support organisations with their whistleblowing arrangements
- Inform public policy and seek legislative change.

Scope: The legal scope of the Public Interest Disclosure Act, on which this policy is based, covers UK staff. McSence has introduced these procedures to enable employees, contractors, sub-contractors, volunteers, management, and supervisory staff to raise or disclose concerns about malpractice in the workplace at an early stage and in the right way, and they apply in all cases where there are genuine concerns, regardless of where this may be and whether the information involved is confidential or not. The term 'malpractice' includes but is not exhaustive of:

- Criminal offences
- Breaches of legal obligations (including negligence, breach of contract, breach of administrative law)
- Miscarriages of justice
- Health and safety
- Damage to the environment
- The concealment of any of the above

Good Faith: If an individual raises a genuine concern and is acting in good faith, even if it is later discovered that they are mistaken, under this policy they will not be at risk of losing their job or suffering any form of retribution as a result. This assurance will not be extended to an individual who maliciously raises a matter they know to be untrue or who is involved in any way in the malpractice.

Authority for Whistleblowing Policy: Overall authority for this policy sits with the Group Operations Manager.

- 🔧 **Business Unit Managers** have a specific responsibility to facilitate the operation of this policy and to ensure that employees, contractors, sub-contractors, volunteers, management, and supervisory staff feel able to raise concerns, without fear of reprisals, in accordance with the procedure set down below. To facilitate this process, managers will be given training on the relevant legal and operational framework and best practice.
- 🔧 **All employees** are responsible for the success of this policy and should ensure that they take steps to disclose any wrongdoing or malpractice of which they become aware.

Procedure for Raising a Concern: If you believe that the actions of anyone (or a group of people) working or volunteering for McSence do or could constitute malpractice you should raise the matter with your Line Manager. Where this is not appropriate because the Line Manager is involved in the alleged malpractice in some way, the matter should be raised with the Line Manager's manager or with the Senior Management Team (SMT). You may raise your concern verbally or in writing and should include full details and, if possible, supporting evidence. You must state that you are using the Whistleblowing Policy and specify whether you wish your identity to be kept confidential. In exceptional circumstances where it would be inappropriate to approach either your Line Manager, their manager, Group Operations Manager, or you may raise the matter directly with the Chief Executive.

Confidentiality: Every effort will be made to keep your identity confidential, at least until any formal investigation is under way. In order not to jeopardise the investigation into the alleged malpractice, you will also be expected to keep the fact that you have raised a concern, the nature of the concern and the identity of those involved confidential. There may be circumstances in which, because of the nature of the investigation or disclosure, it will be necessary to disclose your identity. This may occur in connection with associated disciplinary or legal investigations or proceedings. If in our view such circumstances exist, we will make efforts to inform you that your identity is likely to be disclosed. If it is necessary for you to participate in an investigation, the fact that you made the original disclosure will, so far as is reasonably practicable, be kept confidential and all reasonable steps will be taken to protect you from any victimisation or detriment as a result of having made a disclosure. It is possible, however, that your role as the whistle-blower could still become apparent to third parties during the course of an investigation. Equally, should an investigation lead to a criminal prosecution, it may become necessary for you to provide evidence or be interviewed by the Police. In these circumstances, again, the implications for confidentiality will be discussed with you.

Anonymous Reporting: Anonymous disclosures are challenging to act upon as there may be little or no corroborated evidence to substantiate the allegations. McSence preference is for individuals to come forward with their concerns rather than anonymous reporting as proper investigation may prove impossible if the investigator cannot obtain further information from you, give you feedback or ascertain whether your disclosure was made in good faith.

Support for Whistle-blowers: Once a disclosure is made, a member of the Senior Management Team (SMT) will be allocated as your key contact to keep you up to date with the matter and provide any specific support that you may need. No member of staff who raises genuinely held concerns in good faith under this procedure will be dismissed or subjected to any detriment as a result of such action, even if the concerns turn out to be unfounded. Detriment includes unwarranted disciplinary action and victimisation. If you believe that you are being subjected to a detriment within the workplace as a result of raising concerns under this procedure, you should inform your allocated member of the Senior Management Team (SMT) immediately. Workers who victimise or retaliate against those who have raised concerns under this policy will be subject to disciplinary action.

How a disclosure will be handled? All disclosures will be taken seriously, and the following procedure will be used. If you have any personal interest in the matter you have raised, you must disclose this at the outset. This procedure is not intended to replace the Grievance Procedure, which continues to be the appropriate way to raise personal issues relating to your specific job or employment. Your disclosure under this policy will be acknowledged in writing confirming that the matter will be investigated and that McSence will get back to you in due course. A suitable person will be identified to manage the disclosure. This will be someone who is in a position to take any necessary action as an outcome. A suitable individual will be instructed to investigate the allegation (they will have had no previous involvement in the matter). We aim to start the investigation within two weeks of the disclosure. The length and scope of the investigation will depend on the subject matter of the disclosure. In most instances, there will be an initial assessment of the disclosure to determine whether there are grounds for a more detailed investigation to take place or whether the disclosure is, for example, based on erroneous information.

You may be asked to provide more information during the course of the investigation. The investigation report will be reviewed by the person managing the disclosure. Appropriate action will be taken – this could involve initiating a disciplinary process or informing external authorities if a criminal action has been committed e.g., fraud or theft. We will endeavour to inform you if a referral to an external authority is about to or has taken place, although we may need to make such a referral without your knowledge or consent if we consider it appropriate.

If it is found that there is not sufficient evidence of malpractice, or the actions of the individual(s) are not serious enough to warrant disciplinary action, it may be more appropriate for the manager to take a more informal approach to dealing with the matter. You will receive written notification of the outcome of the investigation, though not all the details or a copy of the report. Possible outcomes of the investigation could be that:

- 📄 The allegation could not be substantiated, or action has been taken to ensure that the problem does not arise again. You will not, however, be given details about the action taken as this could breach the human rights of the person(s) involved.
- 📄 If you are not satisfied with the response you have received, you should raise the matter with the Director outlining your reasons.
- 📄 If you have asked to remain anonymous, care will be taken to respect this request (see section on confidentiality above).

Corrective Action & Compliance: As part of the investigation into disclosures made under this policy, recommendations for change will be invited from the investigator to enable McSence to minimise the risk of the recurrence of any malpractice or impropriety which has been uncovered. The Group Operations Manager will be responsible for reviewing and implementing these recommendations in the future and for reporting on any changes required to the main board.

False Disclosures: McSence will treat all disclosures of malpractice seriously and protects staff who raise concerns in good faith. However, appropriate disciplinary action will be taken in accordance with the Disciplinary Procedure against any employee or volunteer who is found to have made a disclosure maliciously that they know to be untrue, or without reasonable grounds for believing that the information supplied was accurate. This may result in dismissal.

External Confidential Support: Further information, confidential support and guidance is available via the **Public Concern at Work** who are the Whistleblowing Charity and leading authority in this field:

Whistleblowing Advice line: 020 7404 6609 [whistle@pcaw.org.uk/](mailto:whistle@pcaw.org.uk)

Whistleblowing Advice Business Support: 020 3117 2525 services@pcaw.org.uk

Whistleblowing Advice General enquiries: 020 3117 2520

CAN Mezzanine, 7 - 14 Great Dover Street, London SE1 4YR

Company Intranet – Staff Zone: All the McSence Groups policies, procedures, handbooks are available on-line to all employees on the McSence Group's Staff Zone Intranet via our website [Login | McSence](#)

Compliance: Failure to comply with the provisions of this Policy may result in Disciplinary proceedings.



McSence Group Signatory:

David Maxwell | Chief Executive

McSence Group - McSence Communication Ltd, McSence Ltd, McSence Services Ltd & McSence Workspace Ltd

T: 0131 454 1500 | E: mail@mcsence.co.uk | W: www.mcsence.co.uk | FB: www.facebook.com/McSenceGroup

Policy Amendments & Revisions: This policy will be reviewed annually and, if necessary, revised in the light of legislative or organisational changes. Improvements will be made by learning from experience and the use of an established annual review. Should any amendments, revisions, or updates be made to this policy it is the responsibility of the Company Senior Management Team (SMT) to see that all relevant employees receive notice and training if necessary.