



This is our
Whistleblowing

Policy 2023

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INTRODUCTION

Liquid Friday is committed to the highest standards of openness, compliance and accountability.

An important aspect of our accountability and transparency is a mechanism to enable staff and other members of the company to voice concerns in a responsible and effective manner. It is a fundamental of every contract of employment that an employee will not disclose confidential information about the employer's affairs.

Where an individual discovers information which they believe shows serious malpractice or wrongdoing within the business then this information should be disclosed internally without the fear of reprisal and there should be arrangements to enable this to be done independently of line management (although in relatively minor cases the line manager may be the appropriate person to be told.)

The Public Interests Disclosure Act 1998 gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing serious concerns. Liquid Friday has approved the policies below to ensure that no members of staff feel at a disadvantage in raising any legitimate concerns.

It should be noted that this policy is designed to assist individuals who believe they have discovered malpractice. It is not designed to question financial, or business decisions, taken by the Company or to readdress any other matters which have been previously addressed as part of the Companies Grievance or Disciplinary policies.

SCOPE OF POLICY

This policy is designed to enable employees of the Company to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice.

This policy is intended to cover concerns which will be investigated but might then lead to further policies/procedures being invoked i.e. the companies' disciplinary procedures.

These concerns could include but are not limited to;

- Financial malpractice or fraud
- Failure to comply with any legal obligation
- Dangers to Health & Safety or the Environment
- Criminal Activity
- Improper conduct or unethical behaviour
- Attempts to conceal any of these

SAFEGUARDS

This policy is designed to offer protection to those employees who disclose concerns provided the disclosure is made;

- In good faith
- In the reasonable belief of the individual making the disclosure that tends to show malpractice and if they make the disclosure to an appropriate person. In extreme circumstances, malicious cases could give rise to action from the persons complained about
- The company will treat all disclosures in a confidential and sensitive manner. Where known, the identity of the individual making the allegation will remain confidential so long as it does not hinder any investigation

ANONYMITY

It is important that any whistle-blower feels protected through this process. Whilst a Whistleblowing Report can be made anonymously it may affect the possibility of conducting a full and in-depth investigation.

Therefore, if the whistle-blower feels able and comfortable it is beneficial if a report is made with the details of the whistle-blower to support any future investigation.

PROCEDURES FOR MAKING A DISCLOSURE

To make a disclosure in compliance with this policy an employee can submit a report via the "Whistleblowing" Report Form, link below;

[Whistleblowing Form](#)

<https://liquidfriday.typeform.com/to/azHzqC>

A manual form can be found in Appendix One of this policy and can be submitted via the secure HR Post Box.

If none of the above is acceptable to the complainant, then a meeting/notification of the following individuals can be made;

1. Colin Gunnell (CEO)
2. Joe Taffurelli (COO)
3. Lara Biggs (Head of People)
4. Your Line Manager

If there is evidence of criminal activity, then the investigating officer(s) will inform the police. The company will ensure that any internal investigation does not hinder any formal police investigation.

TIMESCALES

Due to the complex nature of these reports, which may involve internal and external investigators, it is not possible to lay down precise timescales for completion of any such investigation.

The investigative officer(s) will ensure that any investigation is undertaken as quickly as possible without affecting the quality and depth of the investigation.

INVESTIGATIVE PROCEDURES

The investigative officer(s) should follow the steps below during any investigation;

1. Full details and clarifications of the complaint obtained.
2. Inform the member of staff against who the complaint is made as soon as possible. The member of staff will be informed of their rights to be accompanied and any immediate action taken, i.e. suspension of duties etc.
3. The investigator should consider the involvement of any company auditors and the police and whether to consult with the Board of Directors.
4. The allegations should be fully investigated by the investigating officers(s).
5. A decision or judgement concerning the complaint will be made by the investigatory officer(s). The decision will be detailed in a written report containing the findings of the investigation and reasons for any judgement. The report will be passed to the Board of Directors as appropriate.
6. The Board of Directors will decide what action to take. If the complaint is shown to be justified, then they will invoke any disciplinary or other appropriate company policies and procedures.
7. The complainant will be informed/kept informed where possible of the progress of the investigations and, if appropriate, the outcome of the investigation.

If the complainant is not satisfied that their concerns is being properly dealt with by the investigatory team/officer, they have the right to raise the concerns with a Director of the business, or one of the people designated above.

TOP LEVEL COMMITMENT

This policy is reviewed annually to ensure fitness for purpose by the Board of Directors and adopted in full by the Liquid Friday management team and has the full support of the CEO and Senior Management.