



## People-126-Whistleblowing Policy

Version No: 2.0

Effective date: 01/06/2020

### 1.0 Policy & Eligibility

#### 1.1 Purpose

The purpose of this policy is to set out the way in which you may raise any concerns that you have and how those concerns will be dealt with. It is important to the TAAS that any fraud, misconduct or wrongdoing by an employee or volunteer of TAAS is reported and properly dealt with. TAAS encourages everyone to raise any concerns that you may have about the conduct of others in the Company or the way in which TAAS is run.

#### 1.2 Scope

This policy applies all TAAS employees and volunteers.

#### 1.3 Requirements

The Public Interest Disclosure Act 1998.

### 2.0 Process Admin

#### 2.1 Approval

Process Author	Hannah Barr, Head of HR
Process Owner	Hannah Barr, Head of HR
Issuing Authority	Nigel Calladine, Quality Manager

#### 2.2 Reason for issue

Effective Date	Version No	Reason for issue
01/10/2015	1.0	Initial issue
01/10/2018	1.1	No Change – Version Control Added
01/06/2020	2.0	Change to document format, Confidential Hotline Number and Procedure removed, rewritten and added to the People-220-Whistleblowing Procedure



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### 3.0 List of Contents

- Whistleblower Definition
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### 4.0 Policy

#### 4.1. Whistleblower Definition

Whistleblowing is the name given to the act of the disclosure of information to an individual or the relevant authority who knows, or suspects, that the Company is responsible for or taken part in some wrongdoing.

Those making qualifying disclosures are protected against dismissal or detriment by The Public Interest Disclosure Act 1998.

#### 4.2. Qualifying Disclosures

Certain disclosures are prescribed by law as “qualifying disclosures”. A “qualifying disclosure” means a disclosure of information that the employee genuinely and reasonably believes is in the public interest and shows that the Company has committed a “relevant failure” by:

- committing a criminal offence
- failing to comply with a legal obligation
- a miscarriage of justice
- endangering the health and safety of an individual
- environmental damage or
- concealing any information relating to the above.

These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. TAAS will take any concerns that you may raise relating to the above matters very seriously.

An employee or volunteer must reasonably believe that the disclosure is “in the public interest”. Should the concern not meet the requirement to be a qualifying disclosure, it should be raised under the People-201-Grievance Procedure.



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Where an employee concern is raised under the People-220-Whistleblowing Procedure where it is not appropriate to do so, i.e. it relates to a personal grievance, the receiving manager will confirm that the matter will be addressed under the People-201-Grievance Procedure.

### 4.3. Principles

- Everyone should be aware of the importance of preventing and eliminating wrongdoing at TAAS. You should be watchful for illegal or unethical conduct and report anything of that nature that you become aware of.
- Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to you.
- Where requested, TAAS will respect (so far as legally possible) the confidentiality of any whistleblowing complaint received, but cannot guarantee that the investigation process will not result in colleagues speculating on the identity of the whistleblower
- You will not be victimised for raising a matter under this procedure. This means that employees continued employment and opportunities for future promotion or training will not be prejudiced because you have raised a legitimate concern. Volunteers will be able to continue in their roles, if that is their wish.
- Victimisation of an employee or volunteer for raising a qualified disclosure will be a disciplinary offence. If a volunteer victimises an employee or volunteer for this reason, it will be considered to be a breach of the Volunteer Code of Conduct.
- If misconduct of an employee is discovered as a result of any investigation under this procedure TAAS's People-202-Disciplinary Procedure will be used, in addition to any appropriate external measures. If misconduct is discovered for a volunteer, the VOL 203 Complaints about a Volunteer Procedure will be followed.
- Maliciously making a false allegation is a disciplinary offence
- An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, you should not agree to remain silent. They should report the matter to a senior member of management or trustee.

### 4.4. Formal Action

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Should formal action be required as a result of any disclosure made under this policy, this action will be carried out in accordance with the applicable internal policy. Any potential sanctions imposed will be fair and reasonable in line with the relevant policy.

### 4.5. Protection against Detrimental Treatment

Bullying, harassment or any other detrimental treatment afforded to an employee or volunteer who has made a qualifying disclosure is unacceptable. Anyone found to have acted in such a manner will be subject to disciplinary action.

All employees and volunteers who raise matters of concern under this policy are protected against detrimental treatment, up to and including dismissal, because they have made a disclosure.

### 4.6. Review

This policy will be monitored periodically by TAAS to judge its effectiveness and will be updated in accordance with changes in the law.

### 5.0 Supporting information

N/A

### 5.1 Definitions / Acronyms

Abbreviations/Acronym	Definitions
TAAS	The Air Ambulance Service (Trading Ltd)

### 5.2 Supporting Documentation

- People-220-Whistleblowing Procedure
- People-201-Grievance Procedure
- VOL – 203 – Complaint about a Volunteer Procedure
- VOL – 404 – Volunteer Handbook (Code of Conduct)

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### 5.3 References

Document Reference Number	Document Title

### 5.4 ISO Clause cross reference