

Whistleblowing Policy



1. Introduction

- 1.1. Eat that Frog expects all its employees to recognise their obligations to the Company, the public and other employees and to provide consistently high standards of performance at all times and in accordance with Eat that Frog's ethos.
- 1.2. As an employee of Eat that Frog, you may be the first to realise that there may be something seriously wrong within the organisation. However, you may not wish to express your concerns because you feel that speaking up would be disloyal to colleagues or the organisation. You may also fear harassment or victimisation, and think it may be easier to ignore the concern rather than report it.
- 1.3. Eat that Frog is committed to the highest standards of openness, probity and accountability. In line with that commitment, we encourage employees, who have serious concerns about any aspect of the Company's work, to come forward and voice those concerns.

2. Purpose

- 2.1 Whistleblowing is when an individual knows, or suspects, that there is some wrongdoing occurring within the organisation and alerts the employer or the relevant authority accordingly.
- 2.2 The Public Interest Disclosure Act 1998 gives protection to individuals, casual workers, agency workers and contractors who make a qualifying disclosure when they reasonably believe it is in the public interest for them to do so. A qualifying disclosure is described in 4.1 below.
- 2.3 This whistleblowing policy sets out the means for employees and workers to raise legitimate concerns and the protections provided to them in doing so.

3. Scope

- 3.1 This policy applies to all employees directly employed by Eat that Frog.
- 3.2 The policy also applies to volunteers, contractors, consultants, temporary employees and agency workers. Where the wording in this policy refers to 'employee' this can be substituted to include the categories of person mentioned.
- 3.3 This policy covers the actions of third parties such as suppliers, service providers, and clients, as well as our staff. Should you have concerns about a third party, you are encouraged to raise them with us before approaching anyone else.

4. What is whistleblowing?

Whistleblowing Policy



- 4.1 We aim to maintain high standards of integrity in everything we do. However organisations can occasionally be affected by conduct that is dangerous, against the law, or that breaches ethical or professional codes. If you have such concerns, we encourage you to report them immediately – this is called ‘whistleblowing’. We will take your concerns seriously, they will be thoroughly investigated, and you can be confident there will be no reprisals.
- 4.2 The types of concerns you may want to raise with us by whistleblowing might include:
- any activity you suspect is criminal (facilitating tax evasion, for example);
 - any activity you suspect puts health and safety at risk;
 - any activity you suspect may damage the environment;
 - any activity you suspect is a miscarriage of justice;
 - any activity you suspect breaches our Bribery policy
 - any failure to comply with legal, financial or regulatory obligations
 - any failure to meet professional requirements
 - any attempt to conceal one or more of these activities.
- 4.3 This policy does not cover anything to do with an employee personally. Other policies such as the Grievance Policy and Procedure or Bullying and Harassment Policy will normally cover most personal concerns.
- 4.4 Employees can speak to their manager if they are not sure whether something they have become aware of is covered by this or another policy.

5. Equal Opportunities

- 5.1 The whistleblowing policy must always be applied fairly and in accordance with employment law and Eat that Frog’s Equal Opportunities Policy.

6. Responsibilities

- 6.1 The role of the Board of Directors is to ensure that agreed staffing policies and systems of infrastructure are in place and operating effectively to ensure that the legal requirements of the Company are met.
- 6.2 External advice may be sought regarding matters which are thought to invoke whistleblowing proceedings.

7. How to raise a whistleblowing concern

Whistleblowing Policy



- 7.1 In most cases, an employee should start by raising their concerns with their manager in writing.
- 7.2 If you would prefer not to go to your manager, or you believe your manager is involved in the concern, or your manager fails to address all your concerns, you should write to:
- a member of the Board of Directors. Ultimately, very serious concerns of malpractice should be referred to a member of the Board of Directors.
 - All referrals made will be treated in the strictest of confidence
- 7.3 Concerns are best raised in writing, stating that concerns are being raised under this policy with a full explanation of what those concerns are. Include all the key facts, dates, and the names of the people involved where possible. Although an employee is not expected to substantially prove an allegation, they will need to demonstrate that there are sufficient grounds of concern.

8. How concerns may be investigated

- 8.1. In order to protect individuals, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations that fall within the scope of specific procedures (for example discrimination issues) will normally be referred for consideration under those procedures.
- 8.2. In all cases, the best course of action could include:
- The case is best investigated internally
 - The matter be referred to the Police
 - The concern will form the subject of an independent inquiry
 - The concern will be referred to an external advisor
 - Or any combination of the above
- 8.3. Where concerns are referred, the employee will be advised of this. Eat that Frog shall take no further action in respect of the complaint until the investigation by the Police or external organisation the complaint has been referred to.
- 8.4. Some concerns may be resolved by an agreed action without the need for an investigation.

Whistleblowing Policy



9. Addressing your concerns

- 9.1. Any person who is informed by an individual of potential wrongdoing will take immediate action to identify the best way to investigate the situation. In doing so, every possible step will be taken to maintain the anonymity of the individual who has made the allegation of wrongdoing.
- 9.2. You will be invited to a meeting to discuss your concerns, and you are entitled to be accompanied at this and any subsequent meetings by a colleague or trade union representative. If you bring a companion, you must both agree to keep your disclosures confidential before and after the meeting and during any investigation that may follow.
- 9.3. After the initial meeting, we will investigate your concerns as deemed appropriate. We may ask you to attend further meetings. To investigate properly, we may involve specialists with particular knowledge or experience of the issues you have raised.
- 9.4. We will keep you informed [in general terms] about how our investigation is progressing and how long it is likely to take. We may not be able to give you details about the investigation (or any action it leads to) as we need to protect confidentiality. We understand this may be frustrating, and we will do our best to reassure you that things are in hand and to explain why we are acting in the way we are.
- 9.5. Employee concerns will be addressed fairly, but we cannot guarantee the outcome of our investigations will be the one you want. If you are not satisfied with how we have conducted the investigations, you can take the matter to another person of more senior authority for further consideration.
- 9.6. Most concerns are raised with good intentions, but occasionally someone makes a false allegation out of malice or because they believe they have something to gain. Anyone found doing this will face action under our disciplinary policy and may be dismissed for misconduct, or even gross misconduct.

10. Confidentiality and anonymity

- 10.1. There is a significant difference between wanting to keep your concerns confidential and making a disclosure anonymously. We actively discourage anonymous whistleblowing.
- 10.2. Concerns raised anonymously are very difficult — and sometimes impossible — to investigate. We cannot properly establish whether allegations are credible without being able to ask you for more details or for clarification, and this makes it hard to reach

Whistleblowing Policy



an informed decision. This is why we urge you not to report matters anonymously. Where you are not confident about raising matters locally they can be raised through a member of the Eat that Frog Board of Directors.

- 10.3. If you do not feel comfortable in reporting your concern openly, tell us and we will do all we can to protect your identity. We may want to disclose your identity to people involved in the investigation, but we will always discuss this with you first.
- 10.4. You are protected from reprisals under this policy (see paragraph 5, but if you are still worried, talk to us. We will explore how far we can go in keeping your concerns confidential.

11. How we protect whistleblowers

- 11.1. Any individual who takes action under the Public Interest Disclosure Act 1998 will be protected from suffering any detriment in relation to the allegations that are made, including victimisation by the organisation or by colleagues.
- 11.2. If the individual does not follow the procedure set out, which encompasses the requirements of the Public Disclosure Act 1998, the protection against detriment will not apply. Disclosing information in an inappropriate way (eg contacting the media) could result in disciplinary action being taken against the individual, which could include dismissal.
- 11.3. If you raise a genuine concern under this policy, we will support you fully even if we find through our investigations that you made a mistake or there has been no breach of policy, legal obligation or other activity set out above in paragraph 4.2 above. However, if you feel you have been treated badly as a result of raising a concern, you must tell us straightaway. First inform your manager or trade union representative and, if the matter remains unresolved, you must follow the formal process in our grievance procedure.
- 11.4. All whistleblowers are given the same protection, so you must not threaten or otherwise badly treat others who have raised concerns under this policy. You may face disciplinary action which could include dismissal for gross misconduct. The whistleblower may also be able to bring legal action against you.
- 11.5. You can get further advice on whistleblowing, protecting confidentiality, and being protected from reprisals at : www.protect-advice.org.uk. Protect is an independent charity that also offers an advice line (020 3117 2520).

Whistleblowing Policy



12. Taking your concerns outside the Company

12.1. This policy outlines the process for raising, investigating, and resolving wrongdoing within the workplace. It should be rarely necessary for anyone outside of [Insert Company Name] to become involved when a whistleblowing allegation is made.

12.2. However, if after raising your concerns within Eat that Frog you are not satisfied with the response, you are entitled to contact a relevant external body to express the concerns. In doing this you should:

- have a reasonable belief that the allegation is based on correct facts
- make the disclosure to a relevant body (ie a regulatory body such as the Health and Safety Executive or the Financial Services Authority)
- have a reasonable belief it is in the public interest to make the disclosure.

12.3. If you do wish to take the matter outside of Eat that Frog, you need to ensure that you do not disclose confidential information or that disclosure would be privileged. This can be checked with Protect who will also advise on ways to proceed and direct you towards the appropriate regulator for the type of issue you want to raise.

13. Outside Support

- Protect (Independent Charity) Tel: 0203 3117 2520 www.protect-advice.org.uk
- The Government has produced a document “Blowing the Whistle to a Prescribed Person – List of Prescribed people and Bodies”. It lists the appropriate organisations to handle whistleblowing complaints and should be referred to for up-to-date advice and guidance about who to contact:-
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/404330/bis-15-43-blowing-the-whistle-to-a-prescribed-person-list-of-prescribed.pdf

14. Contacting the media

14.1. The media is not a relevant external body. Alerting the media to a concern — particularly before or during an internal investigation — is almost never justified or appropriate in any situation. We strongly discourage you from doing so, and will treat any contact with the press as a serious disciplinary issue justifying dismissal unless exceptional circumstances exist. We would normally expect you to have taken all reasonable steps to deal with the matter internally or with an external regulator, and to have taken full advice from a lawyer or from Protect before being justified in approaching the press.

Whistleblowing Policy



15. Review

- 15.1. This policy does not form part of an employee's contract of employment and the Company may amend it at any time.
- 15.2. This policy reflects current statutory legislation at the time of writing. Any changes to statutory legislation will take precedence.
- 15.3. History of Policy Changes

Date	Page	Details of the change	Agreed by
11.06.2018	All	New Policy – Replaces previous Whistleblowing Policy	Board Meeting
Nov 2020	All	2020 Policy Referesh (good Work April 2020)	Board
Dec 2021		Reviewed – no change	Board
Dec 2022		Reviewed – no change	Board
Next review Dec 2023			