
1. Overview and Scope

- 1.1 This policy outlines what you should do if you suspect something at work is putting you or others in danger or is illegal or unethical.
- 1.2 This policy applies to all employees, contractors, consultants, officers, interns, casual and agency workers, volunteers and interns.
- 1.3 If you are an employee, this policy does not form part of your employment contract and we may update it at any time.

2. What is whistleblowing?

- 2.1 We aim to maintain high standards of integrity in everything we do. However, all organisations can occasionally be affected by conduct that is dangerous, against the law, or that breaches ethical or professional codes. If you have any 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.
- 2.2 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 breaches our Bribery policy;
 - Any failure to comply with legal or regulatory obligations;
 - Any failure to meet professional requirements; and/or
 - Sexual harassment disclosure
 - Any attempt to conceal one or more of these activities.
- 2.3 Speak to your line manager or a Director if you are not sure whether something you have become aware of is covered by this policy. If your complaint is about the way people are behaving towards you, then you should refer to our policy on Bullying and Harassment, or to our Grievance Policy, for guidance on how to proceed.

3. How to raise a whistleblowing concern

- 3.1 In most cases, you should start by raising your concerns with your line manager in writing.
- 3.2 If you would prefer not to go to your line manager, you should write to one of the Company's directors or a member of the Senior Leadership Team. You should also do this if your concerns are of a very serious nature.
- 3.3 All staff have a duty to raise any concerns they may have regarding the management of safeguarding and child protection. This includes concerns about the attitudes or actions of colleagues, unsafe or inappropriate practices, or potential failures in Eat That Frog's safeguarding procedures. Where such concerns arise, staff are expected to report them promptly in accordance with the organisation's safeguarding and whistleblowing policies. If it becomes necessary to seek advice or report concerns outside of Eat That Frog, staff should contact the Local Authority Designated Officer (LADO) as the first point of contact.
- 3.4 Your letter should say that you are raising your concerns under this policy and then explain what those concerns are. Include all the key facts, dates, and the names of the people involved.
- 3.5 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. This meeting will be recorded on Breathe under the performance section as "Whistleblowing – Formal – Meeting", unless it relates to an individual who has enhanced Breathe access and who would therefore be able to view this – in which case the meeting should be recorded outside of Breathe, but shared with HR. The meeting should be recorded using the "Record of Conversation" form which can be found on Breathe. If you bring a companion, we ask that you both agree to keep your disclosures confidential before and after the meeting and during any investigation that may follow.
- 3.6 After the initial meeting, we will investigate your concerns, and 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.

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- 3.7 We will keep you informed (in general terms) about how our investigation is progressing and how long is it 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 and comply with legal obligations. We understand this may be frustrating, and so 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.
- 3.8 Your 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 one of our directors for further consideration.
- 3.9 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 is at risk of being dismissed for gross misconduct.

4. Confidentiality and anonymity

- 4.1 There is a significant difference between wanting to keep your concerns confidential and making a disclosure anonymously. We actively discourage anonymous whistleblowing. Concerns raised anonymously are very difficult — and sometimes impossible — to investigate. We can't 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 an informed decision. This is why we urge you not to report matters anonymously.
- 4.2 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.
- 4.3 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.

5. How we protect whistleblowers

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- 5.1 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 that there has been no breach of policy, legal obligation or other activity set out in paragraph 2.2 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 line manager and, if the matter remains unresolved, you must follow the formal process in our Grievance Policy.
- 5.2 All whistleblowers are given the same protection, so you must not threaten or otherwise badly treat others who have raised concerns under this policy. If you do, you may face disciplinary action which could include dismissal for gross misconduct. The whistleblower may also be able to bring legal action against you.

6. Taking your concerns outside the Company

- 6.1 This policy outlines the process for raising, investigating, and resolving wrongdoing within the workplace. It is rarely necessary – or, from our point of view, desirable – for anyone outside the Company to become involved when a whistleblowing allegation is made. The exception to this is for those external individuals or organisations (identified in 3.3, 3.5 and 3.6) who are confidentially supporting the investigation, or the lawyer or Protect as per point 6.4.
- 6.2 In some exceptional circumstances, you may need to go to an external body — an industry regulator, for example. The independent charity Protect can direct you towards the appropriate regulator for the type of issue you want to raise. Protect is an independent charity that offers advice on whistleblowing: <https://protect-advice.org.uk/>
- 6.3 This policy covers the actions of third parties such as suppliers, service providers, and clients, as well as our colleagues. Should you have concerns about a third party, you are encouraged to raise them with us before approaching anyone else. Your line manager or a Director will be able to explain how you should proceed.
- 6.4 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

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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.

7. Abuse of this Policy

- 7.1 All whistleblowers must act in good faith. If we believe that you have raised issues under this Policy – which you knew were untrue – in bad faith or maliciously, then we will deal with this as a disciplinary matter under our Disciplinary Policy. You may be subject to sanctions up to and including dismissal for gross misconduct.

8. Administration of this policy

- 8.1 The HR department is responsible of the administration of this policy. If you have any feedback, please contact HR@eatthatfrog.ac.uk
- 8.2 This policy is reviewed annually.
- 8.3 This policy reflects current statutory legislation at the time of writing. Any changes to statutory legislation will take precedence.
- 8.4 Note: When saving the final draft of this document, ensure that you Ctrl+A to select all, then click F9 to update the contents and all links within the document.

Date	Version	Details of the change	Agreed by
Feb 2025	25.02	Moved to Enlighten HR template. Changes from Enlighten HR template: 3.1 removed face to face submission of whistleblowing – we need it to be written. This is in line with our old policy. 3.2 added senior leadership team as a place to raise whistleblowing concerns as well as directors 3.3 added in point on whistleblowing in relation to safeguarding.	Board

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		3.5 meeting – added details of where to record this meeting on Breathe, or how to record this outside of Breathe if necessary + what form to use to record this meeting. 5.3 removed as broken hyperlink re further advice. 6.1 – added closing sentence re external individuals who are allowed to be informed of a whistleblowing allegation to support with the investigation or the allegation. 6.2 – added a link to the Protect website. (as per our old policy) Changes from old policy: 3.6 – all whistleblowing will be investigated. Previous policy said some may not need investigating after an agreed action. Removed reference to the Public Disclosure Act 1998 as this has been updated and supplemented by wider employment law, forming the basis of the Public Interest Disclosure Order 2014. This policy remains in line with the procedure set out in the Act and the law remains a priority over this policy as per paragraph 8.3. New policy discourages individuals from <u>deciding on their own</u> to take the whistleblowing outside of the company without external advice – as this could put their job at risk. Instead, in paragraph 6.4, this policy <u>encourages employees to check with a third party</u> such as a lawyer or Protect <u>before</u> taking the whistleblowing outside of the company. This helps protect the employee so is in the interest of the employee.	
Aug 2025	25.08	Compared against 25.08 Enlighten Policy – no changes	
April 2026	2.2	Sexual Harassment added to the “qualifying disclosure” under whistle blowing law	Board

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Next review July 2026			