

## WHISTLEBLOWING POLICY

### 1 About this policy

- 1.1 Thrive Scotland is committed to conducting business with honesty and integrity and expects all representing Thrive Scotland to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.

### 2 Definitions

- 2.1 Whistleblowing is the reporting of suspected wrongdoing or dangers, including bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

### 3 How to raise a concern

- 3.1 Concerns should be raised with the Board of Directors. The Director with whom you raise a concern will arrange a meeting as soon as possible with the complainant, who may bring a companion to any meetings. This companion must respect the confidentiality of the disclosure and any subsequent investigation.

### 4 Confidentiality

- 4.1 Completely anonymous disclosures are difficult to investigate. Thrive Scotland will try to keep a complainant's identity secret and only reveal it where necessary to investigating the concern.

### 5 External disclosures

- 5.1 The law recognises that it may be appropriate for a complainant to report concerns to an external body such as a regulator. Thrive Scotland encourages any complainant to seek advice before reporting a concern to anyone external. Public Concern at Work [www.pcaw.co.uk](http://www.pcaw.co.uk) operates a confidential helpline: (020) 7404 6609, [whistle@pcaw.co.uk](mailto:whistle@pcaw.co.uk)

### 6 Protection and support for whistleblowers

- 6.1 Thrive Scotland encourages openness and will support whistleblowers who raise genuine concerns, even if they turn out to be mistaken. However, if a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.
- 6.2 Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If a complainant believes that they have suffered any such treatment, they should inform a member of the Board of Directors immediately.
- 6.3 Representatives of Thrive Scotland must not threaten or retaliate against whistleblowers in any way. In some cases, whistleblowers have a right to sue anyone who does so personally for compensation in an employment tribunal.