

WHISTLEBLOWING POLICY

1 About this policy

- 1.1 Thrive Scotland (Thrive) is committed to conducting business with honesty and integrity and expects all representing Thrive 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, assault, harassment and any breach of legal or professional obligations.

3 How to raise a concern

- 3.1 Concerns should be raised with one or more of Thrive’s 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 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 or the Police. Thrive encourages any complainant to seek advice before reporting a concern to anyone external.

6 Protection and support for whistleblowers

- 6.1 Thrive 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 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 Thrive Director immediately.
- 6.3 Representatives of Thrive must not threaten or retaliate against whistleblowers. In some cases, whistleblowers have a right to sue in an employment tribunal anyone who does so.

7 Policy review

Policy owner	Director of Finance
Reviewed annually	Board of Directors
Policy date	October 2017, last reviewed August 2019
Next policy review date	August 2020