

WHISTLE BLOWING POLICY

Approved By: James Lawrence

Position: Director

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WHISTLE BLOWING POLICY STATEMENT

Peregrine Risk Management is committed to the highest standards of transparency, probity, integrity, and accountability. This Whistleblowing Policy sets out the framework for dealing with allegations of illegal and improper conduct.

This policy is intended to provide a means of making serious allegations about standards, conduct, financial irregularity or possible unlawful action in a way that will ensure confidentiality and protect those making such allegations in the reasonable belief that it is in the public interest to do so from being victimised, discriminated against or disadvantaged. This policy does not replace other policies such as the complaints policy, the Grievance and Harassment and Bullying Policies and other specifically laid down statutory reporting policies.

This policy is intended to ensure that Peregrine Risk Management complies with its duty under the Public Interest Disclosure Act 1998.

SCOPE

This policy applies to all Peregrine Risk Management employees, including Associates and contractors.

This policy does not replace other Peregrine Risk Management policies or policies. For example, if an employee has a grievance about their working conditions, they should use the Peregrine Risk Management Grievance Policy or, if they felt that their manager or a colleague was treating them unfavourably, they should use the Peregrine Risk Management Harassment and Bullying Policy. Similarly, if an employee has a concern about the conduct of a fellow employee in the working environment (e.g. that they are not treating colleagues with respect) they should raise these with their line manager, or if that is not possible then with a Director.

This policy applies to, but is not limited to, allegations about any of the following:

- Conduct which is an offence or breach of the law
- Alleged miscarriage of justice
- Serious Health and Safety risks
- The unauthorised use of public funds
- Possible fraud and corruption
- Sexual, physical, or verbal abuse, or bullying or intimidation of employees, customers, or service users
- Abuse of authority
- Other unethical conduct

Reporting

Option 1.

Reporting a breach must be sent in writing to;
James Lawrence or Wayne Britton
Director
Peregrine Risk Management
Suite 27, Office 100
BLOCK Plymouth, Melville
Royal William Yard
Plymouth
PL1 3RP

Or emailed to;

jlawrence@peregrine-rm.com or wbritton@peregrine-rm.com

Option 2.

Where the Whistle-blower feels that they cannot internally report an allegation through Peregrine Risk Management they do have the alternative option of reporting any allegation to an external body. Ideally workers will feel able to make a disclosure through Peregrine Risk Management, we believe our policies and procedures for handling whistleblowing will help encourage this. However, there may be circumstances where they feel unable to. There are other ways, some of which are set out in law, that a worker may make a disclosure without losing their rights under whistleblowing law. One option for external disclosures of this type is prescribed persons. Prescribed persons are mainly regulators and professional bodies but include other persons and bodies such as MPs. The relevant prescribed person depends on the subject matter of the disclosure. A complete list of prescribed persons can be found here. (<https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-peopleand-bodies--2>)

Prescribed persons have individual policies and procedures for handling concerns and complaints. Generally, these will be accessible on their websites.

Peregrine Risk Management recognises that the decision to make an allegation can be a difficult one to make. However, whistle-blowers that make serious allegations in the reasonable belief that it is in the public interest to do so have nothing to fear because they are doing their duty either to Peregrine Risk Management and/or to those for whom Peregrine Risk Management or they are providing a service. Peregrine Risk Management will take appropriate action to protect a whistle-blower that makes a serious allegation in the reasonable belief that it is in the public interest to do so from any reprisals, harassment, or victimisation

Confidentiality

All allegations will be treated in confidence and every effort will be made not to reveal a whistle-blower's identity unless the whistle-blower otherwise requests. , if the allegation results in court proceedings then the whistle-blower may have to give evidence in open court if the case is to be successful.

Peregrine Risk Management will not, without the whistle-blower's consent, disclose the identity of a whistle-blower to anyone other than a person involved in the investigation/allegation.

Anonymous Allegations

This policy encourages whistle-blowers to put their name to an allegation wherever possible as anonymous allegations may often be difficult to substantiate/prove. Allegations made anonymously are much less powerful but anonymous allegations will be considered at the discretion of the Board.

In exercising discretion to accept an anonymous allegation the facts must be taken into account:

- The seriousness of the issue raised
- The credibility of the allegation
- Whether the allegation can realistically be investigated from factors or sources other than the complainant

False Allegations

No disciplinary or other action will be taken against a whistle-blower that makes an allegation in the reasonable belief that it is in the public interest to do so even if the allegation is not substantiated by an investigation. However, disciplinary action may be taken against a whistle-blower who makes an allegation without reasonable belief that it is in the public interest to do so (e.g. making an allegation frivolously, maliciously or for personal gain where there is no element of public interest).

Policy for Making an Allegation

It is preferable for allegations to be made to an employee's immediate manager to whom they report. However, this may depend on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if the whistle-blower believes that management is involved it would be inappropriate to raise it directly with them. The whistle-blower may then make an allegation directly to a Director:

Allegation

Whether a written or oral report is made it is important that relevant information is provided including:

- The name of the person making the allegation and a contact point.
- The background and history of the allegation (giving relevant dates and names and positions of those who may be in a position to have contributed to the allegation).
- The specific reason for the allegation. Although someone making an allegation will not be expected to prove the truth of any allegations, they will need to provide information to the person they have reported to, to establish that there are reasonable grounds for the allegation.

Someone making an allegation may be accompanied by another person of their choosing during any meetings or interviews in connection with the allegation. However, if the matter is subsequently dealt with through another policy the right to be accompanied will at that stage be in accordance with the relevant policy.

Action on receipt of an Allegation

The line manager will record details of the allegation gathering as much information as possible, (within 5 working days of receipt of the allegation) including:

- The record of the allegation
- The acknowledgement of the allegation
- Any documents supplied by the whistle-blower

The investigator will ask the whistle-blower for his/her preferred means of communication and contact details and use these for all communications with the whistle-blower in order to preserve confidentiality.

If the allegation relates to fraud, potential fraud or other financial irregularity a Director will be informed within 5 working days of receipt of the allegation. The Director will determine whether the allegation should be investigated and the method of investigation.

If the allegation discloses evidence of a criminal offence it will immediately be reported to a Director and a decision will be made as to whether to inform the Police. If the allegation concerns suspected harm to children, the appropriate authorities will be informed immediately.

Timetable

- An acknowledge the allegation in writing within 10 working days with
 - An indication of how Peregrine Risk Management proposes to deal with the matter
 - An estimate of how long it will take to provide a final response
 - An indication of whether any initial enquiries have been made
 - Information on whistle-blower support mechanisms
 - Indication whether further investigations will take place and if not, why not

Where the allegation has been made internally and anonymously, obviously Peregrine Risk Management will be unable to communicate what action has been taken.

Support

Peregrine Risk Management will take steps to minimise any difficulties which may be experienced because of making an allegation. For instance, if a whistle-blower is required to give evidence in criminal or disciplinary proceedings Peregrine Risk Management will arrange for them to receive advice about the policy and advise on the support mechanisms that are available.

Peregrine Risk Management accepts that whistle-blowers need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform those making allegations of the outcome of any investigation.

Responsibility for the Policy

The Board of Directors have overall responsibility for the operation of this Policy and for determining the administrative processes to be followed and the format of the records to be kept.

Monitoring

A Register will record the following details:

- The name and status (e.g. employee) of the whistle-blower
- The date on which the allegation was received
- The nature of the allegation
- Details of the person who received the allegation
- Whether the allegation is to be investigate and, if yes, by whom
- The outcome of the investigation
- Any other relevant details

The Register will be confidential and only available for inspection by the Board of Directors.

Review

This policy is to be reviewed annually or if there is a significant event that affects the integrity and adherence to this policy.



Director: **James Lawrence** SIGNED: _____

This Whistle Blowing Policy is displayed at the Head Office and is available to all personnel including visitors and contractors. All employees are encouraged to read it and communicate any query to the Directors. A copy of the Whistle Blowing Policy can also be obtained on request (to any interested parties) from our Head Office.

Peregrine

Risk Management



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