

## **INS Reporting of Serious Concerns**

The Company is committed to dealing responsibly, openly and professionally with any genuine concern employees may have about malpractice, be it a danger to themselves or INS' customers, financial irregularities, breach of legal obligations or damage to the environment.

The Company cannot do this without employees' help. The simple fact is that in many cases employees may suspect something is going wrong long before the Company finds out about it. In the worst case this may not be until an accident has happened or serious damage has been caused.

If something at work is troubling an employee they should tell the Company. Such matters should be raised with their line manager, but it is recognised that they may prefer another contact point, or would welcome the chance to discuss their concern with an independent person in confidence.

The Company, therefore, has a mechanism for the Reporting of Serious Concerns. It commits INS Ltd. to ensuring that employees will suffer no recrimination or victimisation as a result of raising a genuine concern. This is true even if their concern later proves to be unfounded.

### **Confidential Reporting of Serious Concerns**

The Public Interest Disclosure Act 1998 makes provision for the protection of individuals who disclose information about certain specific issues in certain circumstances. The Act introduces a right to not suffer a detriment and the right not to be unfairly dismissed as a result of making a disclosure in certain specific circumstances.

INS Ltd. employees are covered by specific contractual obligations to maintain confidentiality and not to act in a way that would damage the Company. Equally INS Ltd. employees are covered by the Official Secrets Act.

Independent legal advice prior to undertaking external disclosure outside of this procedure is advised for employees' complete protection and the avoidance of penalties under contractual obligations.

The aim of this procedure is to ensure that individuals and the Company take immediate and appropriate remedial action. Compliance with the following internal procedure is urged because non-compliance with this procedure may limit your legal protection.

### **Procedure for reporting of serious concerns**

The purpose of this policy is to encourage employees to raise any serious concerns about irregular practices and situations at work which could place the Company in a vulnerable position. These concerns might relate to but not be limited to suspected criminal activity, possible unlawful conduct of fellow employees, health and safety matters and environmental issues.

Employees may be worried about raising issues or may want to keep the concerns to themselves, perhaps feeling it's none of their business or that it's only a suspicion. They may feel that raising the matter would be disloyal to their colleagues, managers or to the Company. They may decide to say something but find that they have spoken to the wrong person or raised the issue in the wrong way and are not sure what to do next.

This procedure enables individuals to raise their concerns about any malpractice at an early stage and in the right way. The Company would prefer that they raise the matter when it is just a concern rather than wait for ultimate proof. If something is troubling an individual that they think the Company should know about or look into, then this procedure should be used.

If an employee wishes to raise an issue that they feel is not appropriate to raise by way of this procedure, but is nonetheless a cause for concern, they should speak to their line manager or the Human Resources department who will be able to advise them on the appropriate approach to take (for example following the Company's complaint procedure). Employees may also wish to consult their union representative.

### **INS' assurances to employees**

If an employee raises a genuine concern they will not risk losing their job or suffer any form of retribution as a result of raising the concern. Provided they are acting in good faith, it does not matter if they are mistaken. Of course the Company does not extend this assurance to someone who maliciously raises a matter they know is untrue.

### **Employee confidence**

INS will not tolerate the harassment or victimisation of anyone raising a concern made in good faith and every effort will be made to protect the identity of every employee who has raised a concern. The Company will not disclose their identity without their permission unless legally required to do so. In such an event the Company will ensure that they are apprised of the circumstances surrounding the disclosure and will provide them with appropriate support and advice regarding any necessary legal representation.

Whilst the Company will accept anonymous reports, if an individual does not tell us who they are, it will be much more difficult to look into the matter or to protect their position or to give feedback.

### **How INS will handle the matter**

Once an individual has told the Company of their concern, it will initially assess what action should be taken. This may involve an internal inquiry or a more formal investigation. The Company will tell the individual who is handling the matter, how they can contact them and whether their further assistance may be needed. At their request, the Company will write to them summarising their concern and setting out how it proposes to handle it.

When an employee raises the concern they may be asked how they think the matter might best be resolved. If they have any personal interest in the matter, the Company should be told at the outset. Any allegation will be investigated promptly, thoroughly and objectively within reasonable time limits. If their concern falls more properly within the Complaint Procedure they will be told.

While the purpose of this policy is to enable the Company to investigate possible malpractice and take appropriate steps to deal with it, it will give employees as much feedback as it properly can. If requested, it will confirm its response to them in writing. However, it may not be able to tell employees the precise action taken where this would infringe a duty of confidence owed by INS to someone else.

### Raising a concern internally

If an individual has a concern about malpractice, it should be raised first with their Line Manager or, if this is not appropriate, to a Senior Manager within their Business or with their full time Union Officer if they wish. This may be done verbally or in writing.

The Company recognises that there may be a few instances where employees feel unable to, or it is inappropriate to express their concerns through their line manager, a Senior Manager within their Business or their full time Union Officer. The Company has therefore set up a dedicated and confidential telephone line established to cater for exceptional circumstances. This facility is provided by Safecall, a confidential external telephone service which is available 24 hours per day, seven days a week and 365 days a year. The telephone number is 0800 915 1571. If an employee has any information or concern which they do not wish to raise with line management or their Trade Union representative, this service should be used.

Safecall offers independent advice and all calls will be treated with the utmost confidentiality by independent advisors. Anonymity is not however guaranteed if there is a legal requirement to disclose the caller's identity. It should also be noted that when there is no legal requirement to disclose the caller's identity, there is no guarantee that it will not be deduced by other Company employees.

If an employee feels unable to utilise the processes outlined above, for whatever reason, the matter should be raised with one of the people named below who have special responsibilities which are clearly independent from the business areas pendent from the business area.

Contact	Location	Telephone No
Head of HR	Hinton House	01925 833223
Head of Legal	Hinton House	01925 836238

All calls or correspondence will, of course, be treated sympathetically and in the strictest confidence. They will not in any way have a detrimental effect on employment or careers, provided that the matters raised are in good faith.

An Employee Assistance Programme (EAP) is also available to give individuals access to independent counselling and other help/advice. Healthmatters is a free confidential service offering expert advice, invaluable information, specialist counselling and support.

Healthmatters is available 24 hours a day, 7 days a week, online or on the phone. They aim to answer your questions immediately or to refer you to the most appropriate advisor, counsellor, or source of information.

Tel - 0800 083 7545 (24 hour helpline)

More information on 'The Reporting of Serious Concerns' can be found on the Company's intranet.