

Policy Statement

This Whistleblowing Policy and its underlying processes endeavour to uphold the principles of transparency, openness and protection for Whistleblowers. By training, managing, escalating, and reporting Whistleblowing matters, the Society will ensure all business is conducted in a transparent and impartial manner. The Society recognises Whistleblowing as an early warning indicator and valuable source of information relating to the failure of Society controls and therefore takes Whistleblowing concerns seriously. The Society will always protect those disclosing concerns through the Whistleblowing channel.

This Whistleblowing Policy and its processes are approved and monitored by the Hinckley and Rugby Nominations and Governance Committee. The Board of Directors receive and review an annual report for Whistleblowing and the Whistleblowing Champion is the Chair of the Board.

Policy Purpose – Whistleblowing Procedures and Protection for Whistleblowers

Whistleblowing procedures and protection for Whistleblowers is included in the following applicable legislation, regulation, and guidance:

- Public Disclosure Act 1998
- FCA Handbook SYSC 18 Whistleblowing
- UK Corporate Governance Code
- Department for Business Innovation and Skills
- Advisory, Conciliation and Arbitration Service GOV.UK whistleblower

Scope

Whistleblowing disclosures must be in the public interest and do not include personal grievances. For example, disclosures that may constitute whistleblowing and be protected by law include:

- a criminal offence, for example fraud
- someone's health and safety is in danger
- risk or actual damage to the environment
- a miscarriage of justice
- the company is breaking the law, for example does not have the right insurance
- you believe someone is covering up wrongdoing

Personal grievances complaints that do not count as whistleblowing:

- bullying
- harassment
- discrimination

These are generally not covered by Whistleblowing law, unless your particular case is in the public interest.

Society Whistleblowing Policy

The Society has established, implemented, and maintained appropriate and effective arrangements for the disclosure of reportable concerns by Whistleblowers.

The Society has the following arrangements in place for Whistleblowing:

- Effective handling of concerns: respectful collection of information, impartial and objective assessment of reports, minimised sharing of information, effective planning for the management and escalation of concerns.
- Protection for confidentiality where requested: minimised sharing of information, escalation to the Whistleblowing Champion, controlled management and implementation of actions and redacted documentation and reporting to ensure confidentiality.
- A range of communication channels: email/face-to-face/telephone disclosures available through the Company Secretary/Whistleblowing Champion.
- Clear reporting and disclosing channels, including but not limited to; FCA, PRA, Police, Healthcare Professionals, ICO, RIDDOR, Financial Ombudsman, HSE.
- Monitoring and oversight of Whistleblowers to ensure there is no recrimination or victimisation: communications with Whistleblower, monitoring of HR actions and reporting to the Whistleblowing Champion on any concerns.
- Conflicts of Interest: should a Whistleblowing report induce a potential conflict of interest, an alternative substitute, independent party will be asked to oversee the management of the reporting and where applicable replace the conflicted party within the process.
- All Whistleblowing reports are managed and monitored, and the Whistleblower will be kept informed where feasible.

The Society will ensure it maintains accurate Record Keeping and Documentation:

- Prepare and maintain records: detailed accounts of the report/disclosure and the assessment and management of the concern.
- Annual report to the Board of Directors detailing the operation and effectiveness of the Whistleblowing procedures. All reports will be redacted of individual names to protect confidentiality.
- Prompt reports to the FCA about each case the firm contested but lost before an employment tribunal where the claimant successfully based all or part of their claim on either detriment suffered as a result of making a protected disclosure in breach of section 47B of the Employment Rights Act 1996 or being unfairly dismissed under section 103A of the Employment Rights Act 1996.
- All worker Settlement Agreements will contain a term that makes it clear, that nothing in the agreement prevents a worker from making a protected disclosure. "For the avoidance of doubt, nothing precludes [name of worker] from making a "protected disclosure" within the meaning of

Part 4A (Protected Disclosures) of the Employment Rights Act 1996. This includes protected disclosures made about matters previously disclosed to another recipient.”

- The Society will never ask workers if they have ever made a protected disclosure or prevent protected disclosures in any way.

Support:

- All Whistleblowers are protected and supported, and where feasible will be kept informed on the investigation and resulting actions.
- Support and fair treatment will be offered to any person accused of wrongdoing by a Whistleblower.
- The Whistleblower Champion will oversee all investigations (unless where a conflict of interest arises).

How to blow the Whistle:

Individuals wishing to blow the whistle may do so via the following mechanisms:

	The Society's whistleblowing champion Nemone Wynn-Evans n.wynn-evans@hrbs.co.uk
	The company secretary Grace Tavener cosec@hrbs.co.uk
	For conduct related matters, you can report to the FCA directly www.fca.org.uk/firms/whistleblowing
	For prudential related matters, you can report to the PRA directly www.bankofengland.co.uk/whistleblowing

You may also choose to report concerns anonymously using the following link:

[Whistleblowing](#)

Whistleblowing Champion:

- The Society has allocated Prescribed Responsibility N (PR N) to the Chair of the Board
- The Whistleblowing Champion will always have access to independent legal advice and training.

Policy Breach

The Society takes all Whistleblowing concerns seriously and will provide protection for all those reporting concerns. If upon investigation those concerns are unfounded the Whistleblower will be updated on the investigation and the findings will be recorded. All parties will be supported.

Where the Society acts in a way to the detriment of a Whistleblower the Fitness and Propriety of both the Society and the individuals concerned will be called into question. The FCA will question the Society's continuing satisfaction of Suitability for approved persons or certification status.

Board Reporting and Oversight

The Policy and its underlying controls are approved and monitored by the Nominations and Governance Committee under delegated authority from the Board of Directors.

The Board receive an annual report on the operational effectiveness of the systems and controls in relation to Whistleblowing. The report will not contain details of Whistleblowers and will continue to protect confidentiality.

References

For further guidance and support see the following not-for-profit organisations:

<https://www.wbuk.org/>

<https://protect-advice.org.uk/>

www.acas.org.uk/grievances

[gov.uk whistleblower](http://gov.uk/whistleblower)

Regulations & Legislation

- This policy is in reference to:
- The Parliamentary Commission on Banking Standards (PCBS)
- How we handle disclosures from whistleblowers (fca.org.uk)
- Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998)
- PRA Rulebook- Whistleblowing
- Public Disclosure Act 1998
- FCA Handbook SYSC 18 Whistleblowing
- UK Corporate Governance Code