



LONDON SECURITY SERVICES (UK) LTD

YOU'RE IN SAFE HANDS WITH US

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Confidential Reporting Policy 'Whistleblowing'

1. Introduction

1.1. Workers are often the first to realise that there may be something seriously wrong within an organisation. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or the company. They may also fear harassment or victimisation. In these circumstances it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.

1.2. LSS is committed to the highest possible standards of openness, probity, and accountability. In line with that commitment, we expect workers, and others that we deal with, who have serious concerns about any aspect of LSS work to come forward and voice those concerns. It is recognised that most cases will have to proceed on a confidential basis.

1.3. This policy document makes it clear that you can do so without fear of victimisation, subsequent discrimination, or disadvantage. This Confidential Reporting Policy is intended to encourage and enable workers to raise serious concerns within LSS rather than overlooking a problem.

1.4. The policy applies to all LSS employees (temporary, permanent, part time and full time) and any agency staff or consultants undertaking Company work. It also applies to those contractors working for LSS on Company premises, for example, agency staff, builders, and drivers. It also covers suppliers and those providing services under a contract with LSS Security in their own premises, for example, care homes.

1.5. These procedures are in addition to LSS Complaints Procedure and other statutory reporting procedures.

2. Aims and scope of this Policy

2.1. This policy aims to:

- encourage you to feel confident in raising serious concerns and to question and act upon concerns about practice.
- provide avenues for you to raise those concerns and receive feedback on any action taken.

- ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied.
- reassure you that you will be protected from possible reprisals or victimisation if you have a reasonable belief that you have made any disclosure in good faith.

2.2. There are existing procedures in place to enable you to lodge a grievance relating to your own employment. If your concern relates to conduct of members, this must be dealt with under the Code of Conduct. The Confidential Reporting Policy is intended to cover major concerns that fall outside the scope of other procedures. Your concern may be about something that:

- is unlawful (e.g., theft, fraud, corruption false, claims etc)
- is related to miscarriages of justice.
- relates to possible fraud and corruption.
- is a health and safety risk (including risks to the public as well as other workers)
- damages the environment.
- relates to the unauthorised use of public funds.
- relates to sexual or physical abuse.
- amounts to improper or other unethical conduct.
- makes you feel uncomfortable in terms of known standards, your experience, or the standards you believe LSS Security subscribes to
- is against LSS Security's Procedure Rules and policies or
- falls below established standards of practice.

3. Safeguards

3.1. Harassment or Victimisation

3.2. LSS is committed to good practice and high standards and wants to be supportive of workers.

3.3. LSS recognises that the decision to report a concern can be a difficult one to make (not least because of the fear of reprisal from those responsible for, or suspected of, the malpractice). If what you are saying is true, you should have nothing to fear because you will be doing your duty to your employer and those for whom you are providing a service.

3.4. LSS will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith. However, should you feel that you have suffered harassment, either directly or indirectly, because of raising a concern, you should refer to LSS Harassment Policy. The Personnel Manager can help you with any queries on the Harassment Policy.

3.5. Any investigation into allegations of potential malpractice will not influence, or be influenced by, any disciplinary or redundancy procedures that may already affect you.

4. Confidentiality

4.1. All concerns will be treated in confidence and every effort will be made not to reveal your identity if you so wish. However, you should appreciate that the investigation process may reveal the source of the information and a statement by you may be required as part of the evidence. At the appropriate time you may need to come forward as a witness.

5. Anonymous allegations

5.1. This policy encourages you to put your name to your allegation whenever possible.

5.2. Concerns expressed anonymously are much more difficult to investigate but they will be considered by the investigating committee, nonetheless.

5.3. Factors to be considered by the investigating committee would include:

- the seriousness of the issues raised.
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources.

6. Untrue allegations

6.1. If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you. If, however, you make an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against you.

7. How to raise a concern

7.1. You may wish to consider discussing your concern with a colleague.

7.2. You may invite your trade union/professional association representative.

7.3. You can get advice and guidance on how to pursue matters of concern from:

- your supervisor
- your manager
- the HR Manager
- the Operations Director
- the Commercial Director
- the Customer Services Director

7.4. As a first step, you should normally raise concerns with your immediate supervisor, or manager. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if you believe that management is involved, you should approach the HR Manager, Commercial Director, Customer Services Director, or Operations Director.

7.5. Concerns may be raised verbally or in writing. If you do not feel able to put your concerns in writing, you should phone or meet the appropriate representative who will agree your statement with you. If you wish to make a written report, you are invited to use the following format:

- the background and history of the concern (giving relevant dates names and places).
- the reason why you are particularly concerned about the situation.

7.6. The earlier you express the concern the easier it is to act.

7.7. Although you are not expected to prove the truth of an allegation, you will need to demonstrate to the person that you contact that there are reasonable grounds for your concern.

8. How LSS Security will respond

8.1. LSS Security will respond to your concerns. Please note that testing out your concerns is not the same as either accepting or rejecting them.

8.2. Where appropriate, the matters raised may:

- be investigated by management, internal auditors, or through the disciplinary process.
- be referred to the police.
- be referred to the external auditor.
- form the subject of an independent inquiry.
- be referred to the investigating committee (see anonymous complaints)

8.3. To protect individuals (and those accused of misdeeds or possible malpractice) initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The overriding principle which LSG will have in mind is the public interest. Concerns or allegations which fall within the scope of specific procedures (for example, discrimination issues) will normally be referred for consideration under those procedures.

8.4. Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required, this will be taken before any investigation is conducted.

8.5. Within 3 working days, your concerns will be acknowledged, and you will be given information on staff support mechanisms.

8.6. Within ten working days of a concern being raised, the HR Manager will write to you:

- acknowledging that the concern has been received.
- indicating how LSS proposes to deal with the matter.
- giving an estimate of how long it will take to provide a final response.
- telling you whether any initial enquiries have been made, and

- telling you whether further investigations will take place and if not, why not.

8.7. The amount of contact between you and the officers considering the issues will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided. If necessary, LSS will seek further information from you.

8.8. Where any meeting is arranged (off-site if you so wish) you can be accompanied by a union, professional association representative or a colleague (who is not involved in the area of work in which the concern relates).

8.9. LSS Security will take steps to minimise any difficulties which you may experience because of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings LSG will arrange for you to receive advice about the procedure.

8.10. LSG Security accepts that you need to be assured that the matter has been properly addressed. Subject to any legal constraints, we will inform you of the outcome of any investigation.

9. The responsible officer

9.1. The HR Manager has overall responsibility for the maintenance and operation of this policy. The HR Manager will maintain a record of concerns raised and the outcomes (but in a form which does not endanger your confidentiality) and will report to the Standards Committee at least once a year.

10. How the matter can be taken further

10.1. This policy is intended to provide you with an avenue within LSS to raise concerns. LSS hopes you will be satisfied with any action taken. If you are not, and if you feel it is right to take the matter outside LSS, the following are possible contact points:

- the external auditor
- your trade union
- your local Citizens Advice Bureau or a relevant voluntary organisation
- relevant professional bodies or regulatory organisations
- the police
- your solicitor
- the Ombudsman

10.2. If you do take the matter outside LSG, you should ensure that you do not disclose confidential or privileged information. Please check with the HR Manager, Operations Director or Commercial Director first.