Public Interest Disclosure and Whistleblower Protection Policy

Document Control

Organisation	Six Recruitment Ltd T/A 6 Group
Author	Jennifer Roughley
Creation date	10/07/2025

Revision History

Revision Date	Version Number	Revised By	Description of Revision

Document Approvals

This document requires the following approvals:

Approval	Name	Date
Managing Director	James Beazley	10/07/2025

1. Purpose

The Company recognises that effective and honest communication is essential if concerns about breaches or failures are to be effectively dealt with and the Company's success ensured.

This policy is designed to provide guidance to all those who work with or within the Company, including casual and temporary staff as well as external stakeholders who may from time to time feel that they need to raise certain issues relating to the Company with someone in confidence.

2. Scope

This policy applies where you reasonably believe that one of the following sets of circumstances is occurring, has occurred, or may occur within the Company and that your disclosure is in the public interest:

- a criminal offence has been committed, is being committed or is likely to be committed
- a person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject
- a miscarriage of justice has occurred, is occurring or is likely to occur
- the health and safety of any individual has been, is being or is likely to be endangered
- the environment has been, is being or is likely to be damaged
- information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed

It is not necessary that you prove the breach or failure that you are alleging has occurred or is likely to occur, you may simply raise a reasonable suspicion. However, you should note that you will not be protected from the consequences of making such a disclosure if, by doing so, you commit a criminal offence.

3. Procedure

If you believe that any of the above practices are happening in the Company the following procedure should be followed.

Employee reporting process:

You should initially raise the issues with your Manager, who will treat the matter in confidence.

If it is not appropriate to raise the issues with your Manager, you should raise the issue with a more senior member of management or, if not possible, another member of management at the same level.

It is likely that an investigation will be necessary and you may be required to attend an investigatory meeting as a witness.

At the investigation meeting you will need to explain fully the nature and extent of what you believe is the problem. You may bring a colleague to help you explain the situation more clearly if you wish.

Depending on the nature of your complaint, it may not be possible to find an immediate solution, but your concerns will be investigated as quickly as is reasonably possible, and, where possible, providing such disclosure does not breach confidentiality, you will be advised of the outcome of the investigation in due course. As a minimum you will be advised when any investigation has been completed and that appropriate action has been taken, although you may not be informed of the specific details of the action that has been taken.

External Stakeholder Reporting Process:

External Stakeholders should follow the procedure set out in the External Stakeholder Grievance Policy.

4. Whistleblower Protection:

The Company is committed to protecting whistleblowers from any form of retaliation. Any person who in the public interest raises genuine concerns under this policy will not under any circumstances be subjected to any form of detriment or disadvantage as a result of having raised their concerns. The victimisation or harassment of an individual making a protected disclosure is a disciplinary offence.

To the greatest extent possible, those raising grievances will be informed at the outset who will need to be involved in the process and/or informed of the nature of the grievance.

Where it is necessary for your disclosure and/or the investigative meeting minutes to be shared with additional parties, your consent will be sought.

Where it is necessary for your disclosure and/or the investigative meeting minutes to be supplied to an employee as part of the evidence supporting disciplinary action, appropriate steps will be taken to ensure that your working environment and/or working relationships are not prejudiced by the fact of the disclosure.

5. Alternative Disclosure Options

If you are dissatisfied with the outcome of this procedure you may raise the matter with an External Body. If you remain dissatisfied with the outcome you have the right to express your concerns to the relevant Prescribed Person designated by the Public Interest Disclosure (Prescribed Persons) Order 2014, or any statute or statutory instrument which subsequently supersedes this legislation.

If you reasonably believe that the relevant failure as listed in any of the above practices relates wholly or mainly to the conduct of a person other than someone in the Company, or any other matter for which a person other than the Company has legal responsibility, then you should make that disclosure to that other person.

Also, you may make such a disclosure to Public Concern at Work, the leading authority on public interest whistleblowing if you consider that it has an interest in the matter and, despite the best efforts of the Company, you believe that disclosure within the Company is inappropriate or as noted previously has been unsuccessful. Disclosures made to legal advisors in the course of obtaining legal advice will be protected.

6. Disclosure Integrity

If any disclosure concerns information which you do not substantially believe is true or is made in bad faith (for instance in order to cause disruption within the Company), or indeed if the disclosure is made for personal gain, then you may become subject to action under the disciplinary procedure, which could include dismissal.

While the Company hopes that such disclosures will never be necessary, it also recognises that it may find itself in circumstances which are new to it. Each case will be treated on its own facts.

7. Policy Review

This policy will be reviewed annually or earlier if required due to legal or operational changes.