

GAS Whistle Blowing Policy

What is Whistleblowing?

Whistleblowing is the reporting of wrongdoing that is illegal or severely unethical within the company.

The aim of this policy is to encourage employees and others to confidentially report on their concerns. Employees are often the first to notice if something is not right within the company, hence we have created this policy to encourage employees to take positive action in flagging any concerns they have so that it can be dealt with effectively and in a positive way.

Our aim is to ensure that as a business we are working according to our values and maintaining the highest standards of service. To encourage this, we want to ensure that our employees have the freedom to express their concerns.

If you are considering raising a concern you should read this Policy first. It explains:

- The type of issues that can be raised
- How the person raising a concern will be protected from victimisation and harassment
- How to raise a concern, and
- What GAS will do

Aims of the Policy

The Policy is designed to ensure that you can raise your concerns about wrongdoing or malpractice within GAS Studio without fear of victimisation, subsequent discrimination, disadvantage or dismissal.

It is also intended to encourage and enable you to raise serious concerns within GAS Studio rather than ignoring a problem or 'blowing the whistle' outside.

This Policy aims to:

- Encourage you to feel confident in raising serious concerns at the earliest opportunity 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 made any disclosure in good faith.

Scope of this Policy

This policy aims to enable those who become aware of wrongdoing or malpractice within GAS Studio to report their concerns so that appropriate investigation can occur at the earliest opportunity. The Whistle Blowing Policy is not intended to replace existing policies or procedures.

- If your concern relates to your own treatment as an employee, you should raise it under the existing grievance or harassment procedures
- If a client has a concern about services provided to him/her, it should be raised as a complaint to GAS Studio
- Complaints of misconduct by a GAS Studio employee are dealt with under our disciplinary procedures

Who can raise a concern under this Policy?

The Policy applies to:

- Employees of GAS Studio
- Contractors working for GAS Studio, for example, freelancer designers, developers etc.
- Volunteers working at GAS Studio

What should be reported?

Any serious concerns that you have about service provision or the conduct of GAS Studio Employees or Contractors that:

- Make you feel uncomfortable in terms of known ethical standards
- Are not adhering to GAS Studio's policies and procedures
- Fall below established professional standards of practice
- Demonstrate improper behaviour

These might relate to but is not limited to:

- Discrimination
- A criminal offence

- Health and safety of the public and/or other employees
- Damage to GAS Studio property e.g equipment given to an employee
- Unauthorised use of GAS Studio funds
- Possible fraud and corruption
- Neglect or abuse of clients, or
- Other unethical conduct

Protecting the Whistleblower

Your legal rights

This policy has been written to take account of the Public Interest Disclosure Act 1998 which protects workers making disclosures about certain matters of concern, when those disclosures are made in accordance with the Act's provisions and in the public interest.

In summary:

It makes it unlawful for GAS Studio to dismiss an employee/contractor or allow them to be victimised if they have raised an appropriate, lawful concern.

Harassment or Victimisation

GAS Studio is committed to being supportive to all employees and will always adhere to good practice and high standards.

We recognise that the decision to report a concern can be a difficult one to make. If you honestly and reasonably believe what you are saying is true, you should have nothing to fear because you will be doing your duty to your employer, your colleagues and those for whom you are providing a service.

GAS Studio will not tolerate any harassment or victimisation of a whistleblower (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith and will treat this as a serious disciplinary offence which will be dealt with under our disciplinary policy

Support to you

Throughout this process:

- You will be given full support from our Directors
- Your concerns will be taken seriously, and

- We will do all we can to help you throughout the investigation
- GAS Studio will endeavour to provide appropriate support and advice where possible.

Confidentiality

All concerns will be kept confidential, and we will make every effort not to disclose your identity. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of your disclosure without your help, so you may be asked to come forward as a witness. If you agree to this, you will be offered advice and support from Gail or Steve.

Anonymous Allegations

This Policy encourages you to put your name to your allegation whenever possible. If you do not tell us who you are it will be much more difficult for us to protect your position or to give you feedback. This policy is not ideally suited to concerns raised anonymously.

Concerns expressed anonymously are much less powerful but they may be considered at the discretion of GAS Studio. In exercising this discretion the factors to be taken into account would include:

- the seriousness of the issue raised
- the credibility of the concern, and
- the likelihood of confirming the allegation from other sources

Untrue Allegations

If you make an allegation in good faith and reasonably believe it to be true, but it is not confirmed by the investigation, GAS Studio will recognise your concern and you have nothing to fear. If however, you make an allegation frivolously, maliciously or for personal gain, appropriate action that could include disciplinary action may be taken.

Raising a Concern

Who should you raise your concern with?

Any concerns should be directed to Gail or Steve.

How to raise a concern

You may raise your concern email, telephone or in person. The earlier you express your concern, the easier it is to take action.

You will need to provide the following information:

- the nature of your concern and why you believe it to be true
- the background and history of the concern (giving relevant dates)
- any evidence that you have supporting your concern

Although you are not expected to prove beyond doubt the truth of your suspicion, you will need to demonstrate to the person contacted that you have a genuine concern relating to suspected wrongdoing or malpractice within GAS Studio and there are reasonable grounds for your concern.

You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the matter with the support of a colleague who has had the same experience or concerns.

You may invite a colleague to be present for support during any meetings or interviews in connection with the concerns you have raised.

What will GAS Studio do?

We will respond to your concerns as quickly as possible.

In order to be fair to all employees, including those who may be wrongly or mistakenly accused, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

The investigation may need to be carried out under terms of strict confidentiality, i.e. by not informing the subject of the complaint until (or if) it becomes necessary to do so. In certain cases however, such as allegations of ill treatment of others, suspension from work may have to be considered immediately. Protection of others is paramount in all cases.

How the Matter can be Taken Further

This Policy is intended to provide you with an avenue within GAS Studio to raise concerns. We hope that you will be satisfied with any action taken. If you are not, and you feel it is right to take the matter outside the company then you may do so. the following are our prescribed contacts:

- Police

- Trade union representative
- Legal avenues

This Policy does not prevent you from taking your own legal advice.

Record keeping

We document and keep records of all concerns, disciplinaries and grievances raised. We document the concerns raised and how it was handled. These are all stored confidentially and only referred to when required.