



## Reskinned Whistleblower Policy February 2024

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### **Public Interest Disclosure Policy (Whistleblower Policy)**

Having an open culture at Reskinned is very important to us, which is why if malpractice occurs it should be handled with honest and effective communication. The procedure below provides guidelines to all our team members, casual, temporary agency staff, freelancers, trainees, home workers and contractors, who feel they need to raise certain issues, in confidence.

The *Public Interest Disclosure Act 1998* (commonly known as the 'Whistle Blowing Act') protects workers raise legitimate concerns about

- Being dismissed by Reskinned
- Being subjected to harmful treatment by Reskinned or colleagues
- Being victimised by Reskinned or colleagues

Certain kinds of disclosures qualify for protection, and these are set out below. These disclosures tend to show one or more of the following failures is happening now, has been done in the past, or may be in the future:

- A criminal offence has been committed including offences such as theft, fraud or acts of bribery.
- A person has failed, is failing, or is likely to fail to comply with a legal obligation to which they are subject.
- A miscarriage of justice.
- A danger to the health and safety of any individual.
- Damage to the environment.
- Deliberate covering up of information tending to show any of the above five matters.

The procedure is not a substitute for the Disciplinary and Grievance Policy and is not a channel for team members to raise matters in relation to their terms and conditions of employment. The procedure allows individuals to have their concerns treated in confidence.

### **Your protection:**

If you raise a genuine concern, your position will not be at risk. Provided you are acting in the public interest it does not matter whether or not your concern proves to be well-founded. Reskinned does not of course extend this assurance to someone who acts from an improper motive and raises a matter they know to be untrue.



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### **Your confidence**

Reskinned will not tolerate the victimisation of anyone raising a genuine concern and anyone responsible for such conduct will be subject to disciplinary action. You may decide that you want to raise a concern in confidence, asking for your identity to be protected. If it is not possible to deal with the concern without revealing your identity (for instance because your evidence is needed in court or a disciplinary hearing), there will be a discussion as to whether and how we can proceed. This policy does not cover the situation where information about malpractice is received anonymously; however, discretion will be used in the investigation of such information.

### **Our confidentiality measures**

To ensure the confidentiality of concerns raised, we take the following measures:

- Store and lock any submitted paper documents
- Encrypt electronic information and safeguard databases with relevant password access (e.g. HR having access)

### **Exceptions to confidentiality**

Confidential information may occasionally have to be disclosed for legitimate reasons. Examples are:

- If a regulatory body requests it as part of an investigation or audit
- If our company examines a venture or partnership that requires disclosing some information (within legal boundaries)

### **Disciplinary consequences**

Employees who don't respect our confidentiality policy will face disciplinary and, possibly, legal action.



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### **How to raise your concern**

#### ***Stage 1: Internal Line Manager***

If you have a concern about malpractice, we hope you will feel able to raise it first with your Line Manager or another member of the Senior Leadership Team. This should be a written concern, with the malpractice clearly stated, how you would like it to be investigated and any direct or personal interests in the matter noted.

#### ***Stage 2: Alternative Contacts***

If you feel unable to raise the matter with your Line Manager for whatever reason, please speak to another member of the Senior Leadership Team.

Once you have reported your concern, Reskinned will assess what action should be taken. If your concern falls more appropriately within other policies we will tell you. A member of the Senior Leadership Team will be asked to carry out the investigation.

The disclosure will be treated seriously and promptly investigated and as part of the process the worker will be interviewed and asked to provide a written statement.

Once Reskinned has finalised the investigation any necessary action will be taken.

If requested, we will confirm our response to you in writing. Please note, however, that we may not be able to tell you the precise action we take where this would infringe a duty of confidentiality owed by us to someone else.

### **If you are not satisfied**

If you find that Reskinned's response is not adequate then you may go to the proper authority, but we do ask that this is escalated within the company as a first port of call. While we cannot guarantee that we will respond to all matters in the way that you might wish, the matter will be handled fairly and properly.

### **Policy review**

This policy was published by Michelle Barry on 27/02/2024 and will be reviewed periodically on an annual basis.