



WHISTLEBLOWING POLICY

Introduction

TalkFIRST at all times conducts its business with the highest standards of integrity and honesty. We expect all our workers (whether employees, sub-contractors or temporary staff) to maintain the same standards in everything they do. You are therefore encouraged to report any wrongdoing by TalkFIRST or its workers that falls short of these business principles.

The Public Interest Disclosure Act 1998 protects workers who report wrongdoing within the workplace but it is the aim of this policy to ensure that as far as possible our workers are able to tell us about any wrongdoing that may occur in our offices, or at client's premises, which they believe has occurred or is likely to occur. Nothing in this policy is intended to interfere in your rights under the above Act. If you choose not to follow the procedures outlined in this policy, this will in no way affect your ability to make a protected disclosure to the appropriate authority, and you will not face any detriment if you choose to do so

We recognise that workers may not always feel comfortable discussing their concerns internally, especially if they believe that TalkFIRST itself is responsible for the wrongdoing. The aim of this policy is to ensure that workers are confident that they can raise any matter with TalkFIRST that concerns them in the knowledge that they will be taken seriously, treated as confidential and that no action will be taken against them.

You are encouraged to use the procedure set out below if you have any concerns at all about wrongdoing at work, including any criminal offence, a failure to comply with legal obligations, a miscarriage of justice, a health and safety danger, an environmental risk or a concealment of any of these.

Procedure

If appropriate, discuss the matter with the Project Manager in the first instance.

An informal approach to the Project Manager will be treated as completely confidential and will not result in any report to anyone within TalkFIRST unless you agree. If the matter requires further investigation such an investigation will be carried out and you

will be informed of the outcome of the investigations and what if any action has been taken. If you remain unhappy about the speed or conduct of the investigation or the way in which the matter has been resolved you should refer the matter to a member of the Trustees. When he or she has investigated your complaint they will tell you the result of the investigation and what, if any action, has been taken.

TalkFIRST undertakes that no worker who makes a bone fide report under this procedure will be subjected to any detriment as a result in accordance with Section 47b of the Employment Rights Act 1996. In the event that you believe that you are being subjected to a detriment by any person within TalkFIRST as a result of your decision to invoke the procedure you must inform the Project Manager (or if this is not appropriate a Trustee) immediately and appropriate action will immediately be taken to protect you from any reprisals.

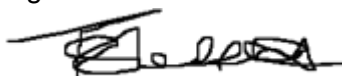
If it should become clear that the procedure has not been invoked in good faith, for example for malicious reasons or to pursue a personal grudge against another worker, this will constitute misconduct and will be dealt with in accordance with the terms of TalkFIRST's disciplinary procedure.

TalkFIRST is keen to hear of any concerns that workers may have about wrongdoing at work and encourages them to use the procedure described above wherever possible.

TalkFIRST recognises that there may be matters that cannot be dealt with internally and external authorities will need to become involved. Where this is necessary TalkFIRST reserves the right to make such a referral without your consent.

If you have any queries about this Policy, or the sorts of situations it will cover, please contact either the Project Manager or the Trustees.

Signed



Name: Tracy Sheppard

Dated: 16th October 2015

Next review date: November 2019