

## Whistleblowing Policy

### Introduction

Pabulum prides itself in conducting its business with the highest standards of integrity and honesty. It expects all its employees to maintain those same standards in everything they do. Employees are therefore encouraged to report any wrongdoing by the Company or its employees that falls short of these business principles.

The Public Interest Disclosure Act 1998 protects employees who report wrongdoing within the workplace. It is the aim of this policy to ensure that as far as possible our employees are able to tell us about any wrongdoing at work which they believe has occurred or is likely to occur.

Pabulum recognises that employees may not always feel comfortable about discussing their concerns internally, especially if they believe that the Company itself is responsible for the wrongdoing. The aim of this policy is to ensure that employees are confident that they can raise any matter with the Company that concerns them in the knowledge that it 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.

This policy covers all employees, officers, consultants, contractors, volunteers, interns, casual workers and agency workers who are directly employed by Pabulum.

This policy does not form part of any employee's contract of employment, and we may amend this policy at any time.

### Procedure

If appropriate, discuss the matter with your Line Manager in the first instance, this will be treated as completely confidential. If the allegation is about the actions of your Line Manager, you can raise the issue with a more Senior Manager.

We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

If the matter requires further investigation, such an investigation will be carried out by an Operations Manager, senior manager (for Office based staff) and/or Head of People and you will be informed of the outcome of the investigation in writing showing what, if any, action has been taken.



Pabulum undertakes that no employee who makes a *bona fide* report under this procedure will be subjected to any detriment as a result, in accordance with the Employment Rights Act 1996, S. 47B. In the event that you believe you are being subjected to a detriment by any person within the Company, as a result of your decision to invoke the procedure, you must inform the Head of People immediately and appropriate action will 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 employee, this will constitute misconduct and will be dealt with in accordance with the terms of the Company's Disciplinary Procedure.

Pabulum is keen to hear any concerns that employees may have about wrongdoing at work and encourages them to use the procedure described wherever possible.

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

We strongly encourage you to seek advice from your line manager or Head of Department before reporting a concern to anyone external. However, if the matter that concerns you is serious and you have exhausted the Company's internal procedures, or you do not have confidence in the Company's actions to investigate the matter, you may contact the appropriate regulating authority relevant to the matter in question. Protect operates a confidential helpline, contact details can be found at the end of this policy.

### Confidentiality

We hope that staff will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity confidential and only reveal it where necessary to those involved in investigating your concern.

### Protection and Support for Whistleblowers

We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform your manager immediately.

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct, you may be subject to disciplinary action.

Protect is a charity which operates a free confidential helpline. Their contact details are at the end of this policy, or you can contact Hospitality Action's Employee Assistance Programme's dedicated Whistleblowing Helpline on 0808 801 0351.



## Contacts

<b>Head of People</b>	Tracy Adams 07464 675186 <a href="mailto:tracyadams@pabulum-catering.co.uk">tracyadams@pabulum-catering.co.uk</a>
<b>Protect</b> (Independent whistleblowing charity)	Helpline: 0203 117 2520 E-mail: <a href="mailto:whistle@pcaw.co.uk">whistle@pcaw.co.uk</a> Website: <a href="http://www.pcaw.co.uk">www.pcaw.co.uk</a>

**Nelson Williams**  
**Managing Director**

*(This policy will be reviewed in November 2022)*

