



## WHISTLEBLOWING FRAUD AND MALPRACTICE POLICY

CATCH is committed to the highest standards of openness, probity, and accountability. At all times CATCH aims to conduct its business in a responsible manner considering the requirements of the law and the standards required from a socially responsible employer. CATCH expects employees and all visitors to always act in a professional manner and uphold the standards set by the organisation.

CATCH takes malpractice very seriously. Employees are, therefore, encouraged to report any wrong doing by the Company or its employees that falls short of our business values.

- **AGILE** – we move quickly to support the needs of our stakeholders (regional and sector)
- **COLLABORATIVE** – we work together with industry, local authorities, industry bodies and training providers to achieve the best possible results
- **ETHICAL** – we are transparent in all our dealings and return 100% of our surplus back into supporting industry and place

It is a fundamental term of every contract of employment that an employee will not disclose confidential information about the employer's affairs. However, as we aim to conduct its affairs in a socially responsible and lawful manner, employees are openly encouraged to report any instances of malpractice, dishonesty, or unsafe or unhealthy working practices which are incompatible with that aim.

It is in the interests of CATCH that employee raise concerns internally rather than disclose them to the press or other external bodies. The purpose of this procedure is to promote greater openness between CATCH and its employees, and to assist individuals who believe they have discovered malpractice or dishonesty in the conduct or management of any entity within the Company.

### Procedure

This procedure is designed to allow any employee to raise concerns or disclose information, which the individual believes shows malpractice.

### Definition of disclosures

This procedure covers serious concerns relating to:

- |                           |  |
|---------------------------|--|
| Criminal activity         | Failure to comply with a legal obligation                    |
| Miscarriage of justice    | Serious failure to comply with health and safety legislation |
| Damage to the environment | Financial malpractice, impropriety or fraud                  |
| Unethical behaviour       | Conduct likely to prejudice the standing of CATCH            |

Attempts to conceal any of the above

It does not matter whether the malpractice in question was in the past, is in the present or will be in the future. Equally, it is not necessary to show that malpractice has been committed, is being committed or is likely to be committed, but merely that the individual has, or had, a reasonable belief that this was, or was likely to be the case.

The procedure does not cover the following, for which separate procedures exist:

- Grievances or disputes affecting terms and conditions of employment or working conditions
- Complaints involving an allegation of misconduct by a member of staff
- Complaints relating to a breach of the principle of equal opportunity
- Complaints regarding the safeguarding of Children & Vulnerable Adults
- Complaints involving an allegation of harassment or bullying

### **Scope**

This policy and procedure apply to all CATCH employees and visitors.

### **Protection**

This procedure is designed to offer protection to those employees who disclose concerns provided the disclosure is made:

- In good faith
- In the reasonable belief that it tends to show malpractice

To an appropriate person as defined below

Individuals who report instances of malpractice in good faith will be protected against dismissal or any form of victimisation. However, those who make disclosures in bad faith, i.e., maliciously, or mischievously, will be subject to the employer's disciplinary procedure.

A disclosure will not qualify for protection if the person making the disclosure commits a criminal offence by making it.

### **Confidentiality**

CATCH will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

Individuals are encouraged to put their name to any disclosures they make. Concerns expressed anonymously will only be considered if the Company decides to do so because of:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources

Any anonymous allegations should be passed to a Senior Manager for consideration, in consultation with others as appropriate.

### **Disclosure Process**

#### **General principles**

This procedure sets out the process to be used to raise issues of concern falling within the scope of this policy. However, it is recognised that in some circumstances it may be inappropriate to go through the various stages either because of the nature of the employment relationship, e.g. the complaint relates to the employee's immediate superior, or where the complainant believes that the matter is of sufficient gravity or urgency. In these circumstances of serious concern, and where this can be readily demonstrated, an employee may start the process at Stage 3.

An employee making a complaint will be allowed reasonable time to seek advice for any meeting which forms part of the process and to be accompanied by a work colleague employed by CATCH of his/her choice.

### **Advice**

If you wish to take advice before raising a concern, you may contact the independent charity, Public Concern at Work on +44 (0) 207 404 6609 or by email to [helpline@pcaw.co.uk](mailto:helpline@pcaw.co.uk). They provide free, confidential legal advice on whistleblowing matters. You should not disclose any confidential information regarding the Company and they will not expect you to do so.

### Stage 1

In the case of a cause for complaint falling within the scope of this policy, the employee should, wherever possible and appropriate, seek to resolve it informally with the appropriate person(s) responsible for the matter which is the subject of complaint.

### Stage 2

Where the matter has not been resolved at Stage 1 an employee may raise the complaint formally with his/her immediate manager in writing. If the concern involves the immediate manager in question, or for any reason he/she prefers that the manager not be told, he/she may raise the matter directly with a senior member of management. The senior manager will determine whether the immediate manager should be consulted or informed of the complaint. The complaint will then be investigated fully.

### Stage 3

If an employee has disclosed a concern internally at Stage 2 and is concerned either by the lack of response or feels unable to talk to anyone for whatever reason, the employee can contact the CEO.

### **Procedures for investigating complaints**

An investigation to ascertain all relevant facts will be conducted as sensitively and speedily as possible with the objective of establishing whether malpractice has occurred. Any person who has had previous involvement in the matter concerned or who will have to reach a decision on the matter will not carry out investigations.

### **Findings**

The findings of any investigation carried out will be communicated to:

- The person raising the malpractice concern
- The individual(s) under investigation
- Those members of CATCH management or external authorities who need to consider whether action should be taken on the basis of the findings (if appropriate).

Signed:

*James McIntosh*

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