

LondonEnergy Ltd
WHISTLEBLOWING POLICY

Purpose:

LondonEnergy Ltd is reliant upon its employees to ensure that best practice is being applied at all times and that they are acting in accordance with the law. All employees have a duty of care to themselves, their colleagues, our customers and the general public. In order to prevent or address wrongdoing all employees have a responsibility to raise issues of concern.

Scope:

This policy applies to all employees and temporary workers.

Responsibilities:

LondonEnergy Ltd expects employees and temporary workers to communicate their concerns in accordance with this policy if they reasonably believe that one of the following has occurred, is occurring or is likely to occur in connection with the operations of the business:

- The endangerment of the health and safety of any individual;
- Damage to the environment;
- A criminal offence;
- A failure to comply with a particular legal obligation imposed by legislation;
- A miscarriage of justice;
- Deliberate concealment of information indicating the occurrence of any of the above.

The above issues are known as qualifying disclosures and are made in the public interest.

This policy is for disclosures about matters other than a breach of an employee's own contract of employment. The employee should use the Company's Grievance procedure if he / she feels that his / her contract has been, or is likely to be, broken.

Procedure:

1. If an employee or temporary staff member or concerned member of the public becomes aware of an act as outlined above, he/she should immediately do one of the following:
 - bring it to the attention of their manager; or (if they believe the manager may be involved)
 - bring it to the attention of the manager's manager; or
 - bring it to the attention of the People/HRBP Department; or

- Call the Whistleblower hotline provided by Safecall on 0800 915 1517; or
 - Send a written report online at www.safecall.co.uk/report.
2. LondonEnergy Ltd acknowledges that it can be both awkward and embarrassing for employees to raise concerns, particularly if they relate to colleagues, managers or the company itself. However, in order for LondonEnergy to investigate concerns it is important that employees identify themselves when making a disclosure. LondonEnergy will ensure that all concerns raised through the appropriate channels will be handled in confidence and, as far as is reasonably practical, the employee's anonymity will be protected.
 3. Where a disclosure is made to Safecall their call handlers will discuss the issue with the whistleblower and the information that is provided will quickly be shared with the most appropriate Senior Managers who are best placed to deal with the issue in line with LondonEnergy Ltd's core values.
 4. Once a disclosure has been made, the Company will investigate the issues raised. The extent of this investigation will depend upon the seriousness of the allegation.
 5. The Company will endeavour to deal with all disclosures with minimum disruption and inconvenience. Where possible, steps will be taken to ensure working relationships are not adversely affected by the allegations.
 6. LondonEnergy will respect all whistleblowers who bring a legitimate and genuine concern to the company's attention and will not subject anyone who makes a disclosure in accordance with this policy, to any detriment.
 7. Employees who raise a qualifying disclosure will be protected from suffering a detriment, bullying or harassment from any other employee. Such conduct will be dealt with under the terms of the Disciplinary procedure.
 8. LondonEnergy recognises that there may be matters that cannot be dealt with satisfactorily within the company and that external authorities will therefore need to become involved. Wherever possible, employees should always advise LondonEnergy of their disclosure and allow LondonEnergy to raise it with the appropriate external authorities.

These external authorities include;

 - HM Revenue & Customs
 - Health and Safety Executive
 - Serious Fraud Office
 - Environment Agency
 - Financial Services Authority
 - Information Commissioner
 - Food Standards Agency.

Where the disclosure is so serious that it cannot be dealt with wholly internally, LondonEnergy reserves the right to make such a referral without the employees' consent.

9. Where an employee or temporary worker raises a qualifying disclosure with the intent of being vexatious and the disclosure proves unfounded, that employee or temporary worker will be subject to the normal disciplinary procedure.

Policy Reviewed - 05th February 2019