

SPRING WHISTLEBLOWING POLICY

JANUARY 2016

DEFINITION

Making a Disclosure in the Public Interest

INTRODUCTION

Spring CCR Ltd. is committed to the highest standards of openness, probity and accountability. This policy is intended to assist persons working with or on behalf of the Company who believe they have discovered malpractice or impropriety. Where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organisation or in connection with client business then this information should be disclosed to a Spring Director without fear of reprisal.

The Company 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.

PROCESS

On receipt of an allegation of malpractice, the Director who receives and takes note of the allegation, must:

- Investigate the allegation unless it is against the receiving Director or is in any way related to the actions of that Director. In such cases, the allegation should be passed to the other Director.
- In the case of an allegation, which is any way connected with but not against the receiving Director, the other Director will nominate an independent person to act as the alternative investigating person.
- In the case of an allegation which is connected to or against both Directors, the Company should provide the name and contact details of an independent person acceptable to both parties as the investigating person.
- Where an allegation involves a client, the Director should contact the most appropriate authority within the client management structure.

TRAINING AND AWARENESS

The Company must distribute this policy to all Directors, Associates (and Contractors where appropriate) and check understanding of the Policy and its process.

Training in Procedures for Making an Allegation must be carried out where knowledge is lacking and on induction of any new Associate (and Contractor where appropriate).

If the person making the allegation is not satisfied with the outcome of the investigation, the Company recognises the lawful rights of persons as employees or contractors to make disclosures to prescribed persons (such as the Health and Safety Executive), or, where justified, elsewhere.



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