Whistleblowing Policy

Company: Clarence Recruitment ("the Company")
Date: August 2026
Review Cycle: Annual, or sooner where required

1. Purpose

Clarence Recruitment is committed to conducting its business with honesty, integrity and transparency and to maintaining high standards of professional and ethical conduct.

We recognise that, despite appropriate policies and controls, concerns about malpractice, wrongdoing or serious risks may arise. It is important that employees, workers and other individuals working with Clarence Recruitment feel able to raise genuine concerns without fear of dismissal, victimisation or other detriment.

This policy provides a clear framework for raising and managing concerns that may amount to **protected disclosures under the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998**, commonly referred to as whistleblowing legislation.

The purpose of this policy is to:

- encourage individuals to raise genuine concerns at an early stage;
- provide clear and accessible reporting routes;
- ensure concerns are taken seriously and dealt with appropriately;
- protect individuals who make qualifying disclosures from unlawful detriment; and
- ensure that Clarence Recruitment responds fairly, consistently and appropriately to concerns raised.

This policy does not form part of any individual's contract of employment or engagement. Clarence Recruitment reserves the right to amend this policy where necessary.

2. Who Can Raise a Concern?

This policy applies to individuals who are working for or providing services to Clarence Recruitment, including:

- employees;
- workers;
- temporary and agency workers;
- contractors and consultants;
- trainees and apprentices;
- officers and directors;
- casual workers;
- individuals working under a contract for services; and
- certain former workers and applicants where applicable under whistleblowing legislation.

There is no minimum length of service required to raise a concern.

The legal protection available to an individual will depend on their employment or working status and the circumstances of the disclosure.

3. What is Whistleblowing?

Whistleblowing occurs when an individual raises a concern about certain types of wrongdoing or malpractice which they reasonably believe is in the public interest.

A whistleblowing concern is different from a personal grievance or complaint.

You do **not** need to prove that the concern is true before raising it. However, you should have a reasonable belief that the information you are disclosing tends to show wrongdoing and that raising the concern is in the public interest.

A genuine concern will be taken seriously even if, following investigation, it is found that no wrongdoing has occurred.

4. Concerns Covered by This Policy

This policy may be used where an individual reasonably believes that information tends to show one or more of the following:

- a criminal offence has been committed, is being committed or is likely to be committed;
- a person has failed, is failing or is likely to fail to comply with a legal obligation;
- a miscarriage of justice has occurred, is occurring or is likely to occur;
- the health or safety of an individual has been, is being or is likely to be endangered;
- the environment has been, is being or is likely to be damaged; or
- information relating to any of the above is being deliberately concealed.
- For Clarence Recruitment, concerns may also include serious or systemic matters relating to:
- safeguarding and Keeping Children Safe in Education (KCSIE) requirements;
- serious breaches of recruitment or employment legislation;
- serious breaches of the REC Code of Professional Practice;
- modern slavery, human trafficking or exploitation;
- serious fraud or financial misconduct;
- serious breaches of data protection requirements;
- serious health and safety concerns;
- bribery or corruption; and
- deliberate attempts to conceal serious wrongdoing.

Where a concern specifically relates to bribery or corruption, it may also be appropriate to follow the reporting procedure in the Company's Anti-Bribery and Corruption Policy.

5. Concerns Not Normally Covered by This Policy

Not every workplace concern is a whistleblowing matter.

5.1 Personal employment concerns

If your concern relates primarily to your own employment or personal treatment at work, such as:

- an individual employment dispute;
- a disagreement with a manager;
- dissatisfaction with working arrangements; or
- a personal grievance,

you should normally raise the matter under the Company's Grievance Procedure, unless you reasonably believe that the matter also raises a wider issue that is in the public interest.

5.2 Candidate or worker complaints

Where a candidate or temporary worker has a complaint about their individual treatment or the service provided by Clarence Recruitment, the **Complaints Policy and Procedure** should normally be used.

However, if the concern involves serious wrongdoing or another matter covered by Section 4 of this policy, it may be appropriate to raise it under this Whistleblowing Policy.

5.3 Concerns relating to clients

Where a concern relates to the activities of a client or hirer, individuals are encouraged to raise the matter with Clarence Recruitment where the concern relates to our recruitment or placement activities or where Clarence may be able to take appropriate action.

Depending on the circumstances, it may also be appropriate to report the concern directly to the relevant client, regulator or prescribed person.

6. How to Raise a Concern

Clarence Recruitment encourages individuals to raise concerns as soon as reasonably possible.

A concern can be raised:

- in person;
- by telephone;
- in writing; or
- by email.

Where possible, we encourage concerns to be made in writing so that there is a clear record of the information provided.

Primary Contact

Mia Jones
Head of Business Services & Governance / Whistleblowing Officer
Email: mia@clarencerecruitment.co.uk

If you are unable to raise the concern with Mia Jones, or the concern relates to Mia Jones, you should raise the matter with:

Wendy Hull
Managing Director

Where appropriate, a concern may also be raised with another Director of Clarence Recruitment.

Individuals are not required to raise a concern with someone who is the subject of the concern.

7. Information to Include

You do not need to have all the facts or evidence before raising a concern.

Where possible, it is helpful to provide:

- a description of the concern;
- what you believe has happened or may happen;
- why you believe the information is credible;
- the background and circumstances;
- relevant dates, locations and individuals involved;
- any documents or other information that may support the concern; and
- details of anyone else who may be able to provide relevant information.

You should not attempt to investigate the matter yourself or put yourself at risk in order to obtain evidence.

8. Anonymous Concerns

Concerns may be raised anonymously.

However, where possible, Clarence Recruitment encourages individuals to provide their name and contact details. This enables us to:

- clarify information where necessary;
- provide appropriate support;
- keep the individual informed of progress; and
- obtain further information that may assist an investigation.

Anonymous concerns will be considered and assessed based on the information available. The Company may be unable to investigate an anonymous concern fully or provide feedback where there is no way of contacting the individual.

9. Confidentiality

Clarence Recruitment will treat whistleblowing concerns sensitively and will make reasonable efforts to protect the confidentiality of individuals who raise concerns.

Information will only be shared with those who need to know in order to assess, investigate or respond to the concern, subject to applicable legal requirements.

There may be circumstances where Clarence Recruitment is legally required to disclose information or where disclosure is necessary to protect individuals from serious harm or to comply with regulatory or law enforcement requirements.

Individuals raising concerns should also respect the confidentiality of the matter and should not discuss the investigation unnecessarily with colleagues or other individuals.

10. How Clarence Recruitment Will Respond

All concerns will be considered seriously and assessed objectively and fairly.

Depending on the nature and seriousness of the concern, our response may include:

- acknowledging receipt of the concern;
- carrying out an initial assessment;
- requesting further information where necessary;
- conducting an internal investigation;
- appointing an independent person to investigate where appropriate;
- consulting professional advisers or relevant specialists;
- referring the matter to a client, regulator or other appropriate organisation;
- reporting suspected criminal activity to the appropriate authorities; or
- taking appropriate disciplinary, contractual or other action.

The investigation process will depend on the circumstances and complexity of the concern.

We will aim to deal with concerns promptly and will keep the individual who raised the concern informed of progress where it is appropriate and lawful to do so.

We may be unable to provide full details of the outcome where doing so would breach another individual's confidentiality, data protection rights or legal obligations.

11. Protection from Detriment and Victimisation

Clarence Recruitment is committed to protecting individuals who raise genuine whistleblowing concerns.

An individual who makes a qualifying disclosure in accordance with applicable legislation must not be subjected to unlawful detriment as a result.

This includes protection from:

- bullying or harassment;
- victimisation;
- threats or intimidation;
- unfair treatment;
- detrimental changes to working arrangements; or
- dismissal where the relevant legal protections apply.

No employee, manager or other individual working for Clarence Recruitment should threaten or retaliate against someone because they have raised or supported a genuine whistleblowing concern.

Any such behaviour may itself be treated as a disciplinary matter.

12. Concerns Raised in Good Faith

You do not need to be certain that wrongdoing has occurred before raising a concern.

If you reasonably believe that the information you have tends to show wrongdoing and that the disclosure is in the public interest, you should feel able to raise it.

A concern will not be treated as inappropriate simply because an investigation subsequently concludes that the concern was mistaken.

However, knowingly making a false or malicious allegation, deliberately providing misleading information or making a disclosure for an improper purpose may result in appropriate action under the Company's relevant procedures.

13. External Reporting

Clarence Recruitment encourages individuals to raise concerns internally wherever this is appropriate and safe to do so, as this may allow the Company to investigate and address the matter promptly.

However, nothing in this policy prevents an individual from exercising their statutory rights to make a protected disclosure to an appropriate external body.

Depending on the nature of the concern, this may include a relevant regulator, professional body or other **prescribed person**.

A current list of prescribed persons and bodies is available on GOV.UK:

GOV.UK – Whistleblowing: prescribed people and bodies

Individuals considering making an external disclosure are encouraged to obtain independent advice where appropriate.

14. Independent Advice

Protect is an independent UK whistleblowing charity that provides confidential advice to individuals considering raising a whistleblowing concern.

Protect – Whistleblowing Advice

Individuals may also seek advice from **ACAS** or their recognised trade union where applicable.

ACAS

15. Record Keeping and Data Protection

Clarence Recruitment will maintain appropriate records of whistleblowing concerns, investigations and actions taken.

Records will be stored securely and access will be restricted to individuals who require access for legitimate business, legal or regulatory purposes.

All personal data relating to whistleblowing concerns will be processed in accordance with the Company's **Data Protection Policy** and applicable data protection legislation.

Particular care will be taken when handling sensitive information relating to allegations, investigations and individuals involved.

16. Responsibilities

All Employees and Workers

Everyone working for or on behalf of Clarence Recruitment is expected to:

- raise genuine concerns promptly;
- provide accurate information to the best of their knowledge;
- cooperate appropriately with investigations;

- maintain confidentiality; and
- not victimise or retaliate against anyone who raises a genuine concern.

Managers

Managers are responsible for:

- creating an environment where concerns can be raised safely;
- taking concerns seriously;
- escalating whistleblowing matters appropriately;
- maintaining confidentiality; and
- ensuring that individuals raising concerns are not subjected to inappropriate treatment.

Whistleblowing Officer

The Head of Risk and Compliance is responsible for:

- receiving and assessing whistleblowing concerns;
- ensuring concerns are appropriately investigated;
- maintaining appropriate records;
- coordinating with senior leadership where necessary;
- ensuring appropriate escalation to external bodies where required; and
- monitoring the effectiveness of this policy.

Senior Leadership

Senior leadership is responsible for:

- maintaining appropriate whistleblowing arrangements;
- ensuring concerns are dealt with fairly and appropriately;
- taking action where wrongdoing is identified; and
- reviewing this policy and related procedures regularly.

17. Review of this Policy

This policy will be reviewed annually, or sooner where there are changes to legislation, regulatory requirements, guidance or the Company's activities.

Policy Owner: Mia Jones, Head of Business Services & Governance
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Next Review Date: March 2027