

QRS WHISTLEBLOWING POLICY

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1. Introduction

In this policy, 'Whistleblowing' means the reporting by employees/casual workers of suspected misconduct, illegal acts or failure to comply with required MRS regulations/Code of Conduct.

The aim of this Policy is to encourage employees/casual workers who have serious concerns about any aspect of QRS's work to come forward and report those concerns internally to a QRS Board Director.

QRS is committed to achieving the highest possible standards of service in all of its practices.

This procedure is not contractual and may be changed by QRS at any time.

If you are considering raising a concern you should read this Policy first. It explains:

- the type of issues that can be raised;
- how the person raising a concern will be protected from victimisation and harassment;
- how to raise a concern, and
- what QRS will do as a result of hearing a concern.

The Policy is designed to ensure that you can raise your concerns about wrongdoing or malpractice within QRS without fear of victimisation, subsequent discrimination, disadvantage or dismissal.

It is also intended to encourage and enable you to raise serious concerns to a QRS Board Director, rather than ignoring a problem or 'blowing the whistle' outside.

This Policy aims to:

- encourage you to feel confident in reporting internally serious concerns at the earliest opportunity and to question and act upon concerns about practice;
- provide avenues for you to raise those concerns and receive feedback on any action taken;
- ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied;
- reassure you that you will be protected from possible reprisals or victimisation if you have made any disclosure in good faith.

The Whistle Blowing Policy is not intended to replace existing procedures:

- If your concern relates to your own treatment as an employee, you should raise it under the existing grievance or harassment procedures;
- If a client has a concern about services provided to him/her, it should be raised as a complaint to the QRS Board;

Who can raise a concern under this Policy? The Policy applies to all:

- employees of QRS;
- those providing services under a contract or other agreement with QRS in their own premises, for example Interviewers, Recruiters and Supervisors;

2. What should be reported?

Any serious concerns that you have about service provision or the conduct of Employees of QRS or those providing services under a contract or other agreement with QRS:

- are not in keeping with QRS policies/procedures;
- fall below established standards of practice; or
- are improper behaviour.

These might relate to:

- breach of Data Protection;
- racial, sexual, disability or other discrimination;
- possible fraud and corruption;
- neglect or abuse of clients, or
- other unethical conduct.

This list is not exhaustive.

3. Protecting the Whistleblower

3.1 Your legal rights

This policy has been written to take account of the Public Interest Disclosure Act 1998 which protects workers making disclosures about certain matters of concern, when those disclosures are made in accordance with the Act's provisions and in the public interest.

The Act makes it unlawful for QRS to dismiss anyone or allow them to be victimised on the basis that they have made an appropriate lawful disclosure in accordance with the Act.

Rarely, a case might arise where it is the employee that has participated in the action causing concern. In such a case it is in the employee's interest to come into the open as soon as possible. The Council cannot promise not to act against such an employee, but the fact that they came forward may be taken into account.

3.2 Harassment or Victimisation

QRS is committed to good practice and high standards and to being supportive of you as an employee.

QRS recognises that the decision to report a concern can be a difficult one to make. If you honestly and reasonably believe what you are saying is true, you should have nothing to fear because you will be doing your duty to QRS, your colleagues and those for whom you are providing a service.

QRS will not tolerate any harassment or victimisation of a whistleblower (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith and will treat this as a serious disciplinary offence which will be dealt with under the disciplinary rules and procedure.

3.3 Support to you

Throughout this process:

- you will be given full support from senior management;
- your concerns will be taken seriously, and;
- QRS will do all it can to help you throughout the investigation.

If appropriate, QRS will consider temporarily re-deploying you for the period of the investigation.

For those who are not QRS employees, QRS will endeavour to provide appropriate advice and support wherever possible.

3.4 Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal your identity if that is your wish. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of your disclosure without your help, so you may be asked to come forward as a witness. If you agree to this, you will be offered advice and support.

3.5 Anonymous Allegations

This Policy encourages you to put your name to your allegation whenever possible. If you do not tell us who you are it will be much more difficult for us to protect your position or to give you feedback. This policy is not ideally suited to concerns raised anonymously.

Concerns expressed anonymously are much less powerful but they may be considered at the discretion of the QRS Board. In exercising this discretion the factors to be taken into account would include:

- the seriousness of the issue raised;
- the credibility of the concern, and;
- the likelihood of confirming the allegation from other sources.

3.6 Untrue Allegations

If you make an allegation in good faith and reasonably believing it to be true, but it is not confirmed by the investigation, QRS will recognise your concern and you have nothing to fear. If however, you make an allegation frivolously, maliciously or for personal gain, appropriate action that could include disciplinary action, may be taken.

4. Raising a Concern

4.1 Who should you raise your concern with?

Issues should be raised with a QRS Board Director.

4.2 How to raise a concern

You may raise your concern by telephone, in person or in writing. The earlier you express your concern, the easier it is to take action. You will need to provide the following information:

- the nature of your concern and why you believe it to be true;
- the background and history of the concern (giving relevant dates);
- although you are not expected to prove beyond doubt, the truth of your suspicion, you will need to demonstrate to the QRS Board Director that you have a genuine concern relating to suspected wrongdoing or malpractice within QRS and there are reasonable grounds for your concern.

You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns. You may invite a trade union representative or a colleague to be present for support during any meetings or interviews in connection with the concerns you have raised.

5. What QRS will do

QRS will respond to your concerns as quickly as possible.

The overriding principle for QRS will be the public interest. In order to be fair to all employees, including those who may be wrongly or mistakenly accused, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

Where allegations are made that may impact our clients, QRS will report these allegations to the relevant client accordingly.

The investigation may need to be carried out under terms of strict confidentiality, i.e. by not informing the subject of the complaint until (or if) it becomes necessary to do so. In certain cases however, such as allegations of ill treatment of others, suspension from work may have to be considered immediately. Protection of others is paramount in all cases.

Where appropriate, the matters raised may:

- be investigated by management, internal audit, or through the disciplinary/grievance process;
- be referred to the police;
- be referred to the MRS;
- be referred to the Information Commissioners Office.

Within ten working days of a concern being raised, the person investigating your concern will write to you:

- acknowledging that the concern has been received;
- indicating how QRS proposes to deal with the matter;
- supplying you with information on support mechanisms;
- telling you whether further investigations will take place and if not, why not.

The amount of contact between you and the person considering the issues will depend on the nature of the matters raised, the potential difficulties involved and the clarity of your information. It is likely that you will be interviewed to ensure that your disclosure is fully understood.

Any meeting can be arranged away from the workplace, if you wish, and a union or professional association representative or a colleague may accompany you in support.

QRS will do what it can to minimise any difficulties that you may experience as a result of raising a concern. For instance, if you are asked to give evidence in criminal or disciplinary proceedings, QRS will arrange for you to receive appropriate advice and support.

You need to be assured that your disclosure has been properly addressed. Unless there are any legal reasons why this cannot be done, you will be kept informed of the progress and outcome of any investigation.

6. The Responsible Officer

The HR Director has overall responsibility for the maintenance and operation of this Policy.

7. How the Matter can be Taken Further

This Policy is intended to provide you with an avenue within QRS to raise concerns. QRS hopes you will be satisfied with any action taken. If you are not, and you feel it is right to take the matter outside of QRS, the following are prescribed contacts:

- The police;
- The ICO;
- The Market Research Society.

If you raise concerns **outside** QRS you should ensure that it is to one of these prescribed contacts. A public disclosure to anyone else could take you outside the protection of the Public Interest Disclosure Act and of this Policy.

You should not disclose information that is confidential to QRS or to anyone else, such as a client or contractor of QRS, except to those included in the list of prescribed contacts.

This Policy **does not** prevent you from taking your own legal advice.

8. Review of the Policy

The Board of QRS will review this Policy annually.

9. Corporate Recording and Monitoring

The HR Director will maintain a corporate register containing all concerns that are brought to his/her attention.

The HR Director will review the corporate register and produce an annual report for the QRS Board. The report will include a summary of the concerns raised, to which department they related, the post to which the concerns related (if not confidential) and any lessons learned. The report will not include any employee names. The aim of this is to ensure that:

- QRS and/or the relevant department learns from mistakes and does not repeat them, and
- consistency of approach across the departments.

The corporate register together with the annual reports will be available for inspection by internal and external audit, after removing any confidential details.

These policies supplement your terms of employment but are not of contractual effect. Their purpose is to explain the Company's current policies and procedures, but they may be subject to change without notice if changes are considered appropriate by the Company or if there are changes in relevant legislation