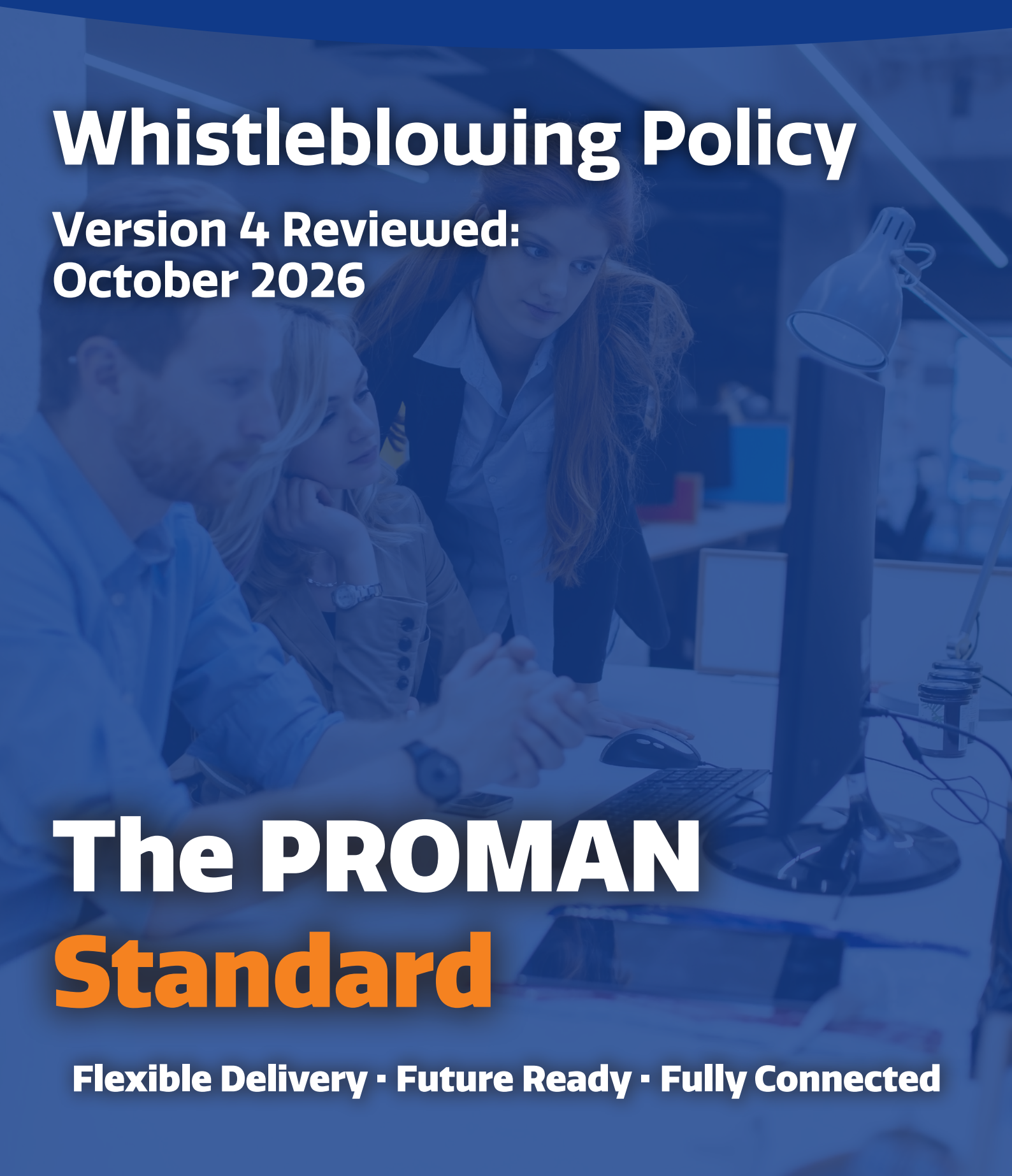
PROMAN

Whistleblowing Policy

Version 4 Reviewed: October 2026



The PROMAN Standard

Flexible Delivery · Future Ready · Fully Connected


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1. INTRODUCTION

1.1 PROMAN is committed to conducting its business with honesty and integrity and aims to achieve the highest possible standards of service and ethical standards in all of its practices.

1.2 We expect all staff to maintain the same high standards too; however, all organisations face the risk of things going wrong and sometimes malpractice and wrongdoing can take place. We take malpractice and wrongdoing very seriously and aim to prevent and eliminate any wrongdoing or malpractice within the organisation.

1.3 We therefore encourage all staff to raise any concerns they may have about malpractice or wrongdoing within the organisation freely and without fear of suffering a detriment or dismissal to enable us to eliminate and prevent wrongdoing or malpractice within the organisation.

1.4 We will treat any concerns raised seriously and will protect and support any individual who makes a disclosure in line with this policy.

1.5 This policy does not form part of any contract; PROMAN reserves the right to amend this policy at any time without prior notice.

2. WHO CAN RAISE A CONCERN UNDER THIS POLICY?

2.1 This policy applies to all current and former employees, workers, officers, consultants, contractors of our business, including home workers, trainees, apprentices, agency workers, casual workers and limited company contractors.

2.2 No qualifying length of service is required in order to raise a concern under this policy.

3. WHEN TO USE THIS POLICY

3.1 This policy should be used to report concerns of malpractice or wrongdoing in relation to our organisation's activities where you have information which you reasonably believe tends to show one or more of the following:

> That a criminal offence has been committed, is being committed or is likely to be committed (excluding bribery and corruption, which should be reported using the Anti-Bribery and Corruption Policy).

> That a person has failed, is failing or is likely to fail to comply with any legal obligation (excluding bribery and corruption).

> That a miscarriage of justice has occurred, is occurring or is likely to occur.

> That the health or safety of an individual has been, is being, or is likely to be endangered.

> That the environment has been, is being, or is likely to be damaged.

> That any of the above malpractices have been, are being, or are likely to be deliberately concealed.

> That sexual harassment has occurred, is occurring or is likely to occur (this category has applied since 6 April 2026).

> Breach of the REC Code of professional practice or Gangmasters & Labour Abuse Authority legislation.

3.2 You must reasonably believe that the disclosure is being made in the public interest.

3.3 It doesn't matter if you are mistaken about your concern, but you must have information that tends to show some malpractice or wrongdoing rather than an opinion or a feeling.

3.4 Sexual harassment: you can raise a concern about sexual harassment under this policy, or using the routes in our Sexual Harassment Policy or our Complaints, Whistleblowing & Misconduct Reporting Policy. The legal protection depends on what you disclose and to whom, not on which internal policy you use, so you will not lose protection by choosing one route over another. Where a concern about sexual harassment is raised under this policy, it will also be handled in line with our Sexual Harassment Policy so that the person affected is supported and protected.

4. DISCLOSURES THAT ARE NOT COVERED BY THIS POLICY

4.1 You will not qualify for protection under this policy if you commit an offence in making the disclosure, or if you disclose a matter subject to legal professional privilege.

4.2 If your concern relates to your own treatment as an employee, you should raise it under our Grievance Policy instead, unless you reasonably believe the matter is in the public interest. If your concern is about sexual harassment, including harassment of you, you can use our Sexual Harassment Policy, and see paragraph 3.4.

4.3 If your concern relates to your own treatment but you are not an employee of PROMAN, you should use our Complaints, Whistleblowing & Misconduct Reporting Policy instead.

4.4 If you wish to raise a concern of suspected malpractice or wrongdoing in relation to a hirer's activities you may need to raise the concern directly with the hirer instead. However, if you are being harassed by anyone at a hirer's site, including the hirer's own staff, you should always also report it to PROMAN so that we can act on it.

4.5 Any other concerns about our services generally which are not related to the types of wrongdoing or malpractice covered by this policy should be raised using our Complaints, Whistleblowing & Misconduct Reporting Policy instead.

5. HOW TO RAISE A CONCERN

5.1 To raise a concern under this policy, in the first instance raise it with your Head of Department if you feel confident to do so. Agency workers should raise concerns with the consultant responsible for managing their assignment.

5.2 If you do not feel confident raising it with your Head of Department (or consultant), or you remain concerned after doing so, report it using our confidential reporting form: **Submit a Report HERE**. This is the same form used for reports under our Complaints, Whistleblowing & Misconduct Reporting Policy, and it can be completed anonymously.

5.3 If the matter is so serious that you cannot use either of these routes, raise it directly with the Co-Managing Director (Corporate Resources) or the Head of Compliance.

Note: concerns that are specifically compliance or regulatory in nature (for example REC Code or GLAA-related matters) may be best raised directly with the Head of Compliance in the first instance, given their specialist role.

5.4 A disclosure can be made by telephone, in person or in writing (including by email); written is preferable so we can keep an exact record.

5.5 You will generally need to provide: the nature of the concern; why you believe it to be true; the background and history; and relevant dates where possible.

5.6 You can raise concerns anonymously; we encourage you to give your name where possible as it may be harder to protect your position or provide feedback if you remain anonymous.

5.7 You may discuss your concern with a colleague first, and can raise a concern alone or with a colleague; confidentiality should be maintained once a formal concern is raised.

6. HOW WE RESPOND TO CONCERNS RAISED UNDER THIS POLICY

6.1 All disclosures will be dealt with objectively, consistently, fairly and professionally.

6.2 We will arrange a meeting as soon as possible to discuss your concern (unless raised anonymously) to establish background and facts.

6.3 You may bring a colleague to any meeting; the companion must respect confidentiality.

6.4 Concerns raised will be recorded in our Central Database.

6.5 We will decide how to respond, usually via internal enquiries and, if necessary, a formal or informal investigation within a reasonable time.

6.6 We will keep you informed of progress and give an indication of timescales, subject to confidentiality duties owed to others.

6.7 Anonymous concerns will be considered at our discretion, taking into account seriousness, credibility and likelihood of corroboration.

6.8 If disciplinary or other proceedings follow, we may ask you to come forward as a witness.

7. CONFIDENTIALITY

7.1 All concerns raised will be treated as confidential; every effort will be made not to reveal your identity. Unless the law requires otherwise, disclosures to third parties or other staff will only be made with your consent. Nothing in any agreement with PROMAN prevents you from making a protected disclosure.

8. RAISING YOUR CONCERN EXTERNALLY (EXCEPTIONAL CASES)

8.1 The main purpose of this policy is to give staff the opportunity and protection to raise concerns internally, which is the most appropriate course of action in almost all cases.

8.2 If you cannot raise concerns internally and reasonably believe the information is substantially true and in the public interest, the law allows raising the matter with an approved person (e.g. a regulator, professional body, or an MP). A list of prescribed people and bodies is on GOV.UK.

8.3 We strongly encourage seeking advice before reporting externally. PROTECT (independent whistleblowing charity) and ACAS both operate confidential helplines; contact details are in section 10.

9. PROTECTION AND SUPPORT FOR THOSE RAISING CONCERNS

9.1 We hope all staff will feel able to voice concerns freely under this policy.

9.2 PROMAN is committed to supporting staff who raise genuine concerns, even if mistaken.

9.3 Anyone raising a genuine concern must not suffer detriment as a result. If you believe you have, inform Co-Managing Director (Corporate Resources), or the Head of Compliance, immediately.

9.4 PROMAN will not tolerate harassment or victimisation of those who raise concerns. Retaliation may lead to disciplinary action and personal liability for compensation claims.

9.5 Raising a concern that you know to be untrue may lead to disciplinary action against you. You will not be disciplined for raising a concern that you honestly and reasonably believed, even if it turns out to be mistaken.

9.6 If you are unhappy with how a matter was handled, raise it via our Complaints, Whistleblowing & Misconduct Reporting Policy; employees can use the Grievance Policy instead.

10. FURTHER INFORMATION AND CONTACTS

Contact	What they can help with	How to contact
Co-Managing Director (Corporate Resources) or Head of Compliance	Queries about this policy	Contact them directly
PROTECT	Free, confidential helpline from the independent whistleblowing charity	Helpline: 020 3117 2520 www.protect-advice.org.uk
ACAS	Free helpline	Helpline: 0300 123 1100 (Mon–Fri, 8am–6pm) www.acas.org.uk
Trade union	Advice for trade union members	Your union representative



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