

# OCEAN SCIENCE CONSULTING LIMITED (OSC)

## Whistle Blowing Policy

### 1. WHAT DOES YOUR POLICY COVER?

In this policy "whistleblowing" means the reporting by employees of suspected misconduct, illegal acts, or failure to act within Ocean Science Consulting Limited (OSC).

This policy exists to encourage employees and others who have serious concerns about any aspect of OSC practices, and to come forward and voice those concerns in an appropriate way in line with the Public Interest Disclosure Act 1998.

The policy is to be applied consistently in line with OSC values.

### 2. POLICY AIM

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

It is also intended to encourage and enable you to raise serious concerns **within** OSC rather than ignoring a problem or 'blowing the whistle' outside.

This Policy aims to:

- encourage you to feel confident in raising 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; and,
- reassure you that you will be protected from possible reprisals or victimisation if you have made any disclosure in good faith.

### 3. WHO IS COVERED BY THE POLICY?

This whistleblowing policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with OSC (including third parties), or any of OSC's subsidiaries or their employees, no matter where they are located (within or outside the UK).

### 4. WHAT TO REPORT?

Any serious concerns that you have about service provision or the conduct of officers or members of OSC or others acting on behalf of OSC that:

- make you feel uncomfortable in terms of known standards;

- are not in keeping with OSC's policies;
- fall below established standards of practice; or
- are improper behaviour.

These might relate to:

- conduct which is an offence or a breach of the law (a criminal offence has been committed or failing to comply with any other legal obligation);
- disclosures related to miscarriages of justice;
- racial, sexual, disability or other discrimination;
- health and safety of the public and/or other employees;
- damage to the environment;
- possible fraud and corruption;
- neglect or abuse of clients; and,
- other unethical conduct.

## **5. PROTECTING THE WHISTLEBLOWER**

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 OSC 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. OSC cannot promise not to act against such an employee, but the fact that they came forward may be taken into account.

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.

If you make an allegation in good faith and reasonably believing it to be true, but it is not confirmed by the investigation, OSC 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.

## **6. WHAT HAPPENS IF I NEED TO RAISE A CONCERN?**

This will depend on the seriousness and sensitivity of the issues involved and who is suspected of wrongdoing. Concerns should be raised with:

- Line manager;
- Department lead; or
- Managing Director

A concern can be raised by telephone, in person, or in writing. You are encouraged to raise your concerns at as early a stage as possible. If you are uncertain about

whether a certain action or behaviour can be considered 'whistleblowing' you should speak to your line manager or a Managing Director.

OSC will familiarise all employees with its whistleblowing procedures so employees can vocalise their concerns swiftly and confidentially.

Matters will all be handled internally; however, if you do not feel satisfied, then pursue the following options

- The Police; or
- Other relevant bodies prescribed by legislation.

This policy does not prevent an individual seeking own legal advise

## **7. MONITORING AND REVIEWING**

OSC's compliance manager is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.

Signed:



Dr Victoria Todd  
**Director**



Ian Todd  
**Director**

Date: 05/02/2021