

# Weightmans

## Whistleblowing Policy

## 1 Purpose & scope

- 1.1 Weightmans is committed to conducting our business with honesty and integrity, and expects all partners and employees to maintain high standards in accordance with the Code of Conduct required by the Solicitors Regulation Authority (SRA). However, we are aware that we face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.
- 1.2 The aims of this policy are:
- 1.2.1 To encourage partners and employees to report suspected wrongdoing as soon as possible.
  - 1.2.2 To encourage partners and employees to raise any concerns they may have in relation to their own behaviour or conduct.
  - 1.2.3 To provide partners and employees with guidance as to how to raise those concerns.
  - 1.2.4 To reassure partners and employees that they are able to raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken.

## 2 Who is covered by this policy?

This policy applies to any and all individuals working at any and all levels of the firm (collectively referred to as "partners" or "employees" in this policy).

## 3 What is whistleblowing?

- 3.1 "Whistleblowing" is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:
- 3.1.1 criminal activity;
  - 3.1.2 miscarriages of justice;
  - 3.1.3 danger to health and safety;
  - 3.1.4 damage to the environment;
  - 3.1.5 failure to comply with any legal or professional obligations or regulatory requirements, including the SRA's Code of Conduct and Accounts Rules;
  - 3.1.6 bribery;
  - 3.1.7 financial fraud or mismanagement;
  - 3.1.8 negligence;
  - 3.1.9 breach of our internal policies and procedures;

- 3.1.10 conduct likely to damage our reputation;
  - 3.1.11 unauthorised disclosure of confidential information;
  - 3.1.12 the deliberate concealment of any of the above matters.
- 3.2 A "whistleblower" is a person who raises a genuine concern in good faith relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a "whistleblowing concern") you should report it under this policy.
- 3.3 If you are uncertain whether something is within the scope of this policy, you should seek advice from the firm's Compliance Officer for Legal Practice ("COLP") or, in the case of breaches of the SRA's Accounts Rules, the Compliance Officer for Finance and Administration ("COFA"), whose contact details are at the end of this policy.

## **4 Raising a whistleblowing concern**

- 4.1 We hope that in many cases you will be able to raise any concerns with your Head of Service Delivery. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases they may refer the matter to the COLP.
- 4.2 However, where the matter is more serious, or you feel that your Head of Service Delivery has not addressed your concern, or you prefer not to raise it with them for any reason, you should raise it with the COLP.
- 4.3 If you feel you cannot raise it with the COLP, please contact HR.

## **5 Confidentiality**

- 5.1 We hope that partners and employees will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.
- 5.2 We encourage people not to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible and have been made in good faith. Whistleblowers who are concerned about possible reprisals if their identity is revealed should contact the COLP and appropriate measures can then be taken to preserve confidentiality.

## **6 External disclosures**

- 6.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases, you should not find it necessary to alert anyone externally.
- 6.2 The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body, such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external.

- 6.3 Whistleblowing concerns usually relate to the conduct of our partners and employees, but they may sometimes relate to the actions of a third party, such as a client, supplier or service provider. The law allows you to raise a concern in good faith with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, we encourage you to report such concerns internally first. You should contact your Head of Service Delivery, HR or the COLP for guidance.

## **7 Investigation and outcome**

- 7.1 Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.
- 7.2 We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.
- 7.3 If we conclude that a whistleblower has made false allegations maliciously, in bad faith or with a view to personal gain, the whistleblower will be subject to disciplinary action.

## **8 If you are not satisfied**

- 8.1 While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.
- 8.2 If you are not happy with the way in which your concern has been handled, you can appeal in writing to the HR team.

## **9 Protection and support for whistleblowers**

- 9.1 Whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support partners and employees who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 9.2 Partners and employees must not suffer any detrimental treatment as a result of raising a concern in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the COLP and/or HR immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.
- 9.3 Partners and employees must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

## 10 Responsibility for the success of this policy

- 10.1 Weightmans' Board of Directors has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.
- 10.2 The COLP has day-to-day operational responsibility for this policy, and must ensure that all managers and other partners and employees who may deal with concerns or investigations under this policy receive regular and appropriate training.
- 10.3 The COLP should review this policy from a legal and operational perspective at least once a year.
- 10.4 All partners and employees are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Partners and employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the COLP.

## 11 Contacts

COLP	James Holman 0151 242 7943 james.holman@weightmans.com
COFA	James Holman 0151 242 7943 james.holman@weightmans.com
Managing Partner	John Schorah 0151 243 9897 John.schorahl@weightmans.com

This policy does not form part of any employee's contract of employment and it may be amended at any time. We may also vary this policy, including any time limits, as appropriate in any case.