



People Management

Whistleblowing – External Stakeholders

Introduction

We are committed to conducting our business with honesty and integrity and expect all individuals to maintain the high standards as set by the firm through its internal procedures and by the SRA under the Solicitors' Code of Conduct. However, all organisations face the risk of things going wrong from time to time, and/or of unknowingly harbouring unethical and even illegal conduct. Therefore, a culture of **openness and accountability** is essential to prevent such situations occurring and/or to enable us to address them when they do occur. As such we look to:

- Actively encourage individuals to report suspected wrongdoings as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected;
- Provide guidance on how to raise concerns (see below);
- Reassure individuals that they should be able to raise genuine concerns in good faith without fear of reprisal, even if they turn out to be mistaken.

This policy takes account of the Whistleblowing Arrangements Code of Practice issued by the British Standards Institute and Protect. It does not form part of any employee's contract of employment (and as such may be amended at any time). It applies to all partners, employees, managers, consultants, contractors, trainees, casual and agency workers and work experience students associated with Aaron & Partners LLP.

What Is Whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- criminal activity;
- danger to health and safety or to the environment;
- failure to comply with any legal or professional obligation or regulatory requirements, including the SRA Code of Conduct for Solicitors, RELs and RFLs, the SRA Code of Conduct for Firms and the SRA Accounts Rules;
- bribery;
- financial fraud or mismanagement;
- negligence;
- breach of internal policies and procedures;
- unauthorised disclosure of confidential information;
- conduct likely to damage our reputation;
- the deliberate concealment of any of the above matters.



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A whistleblower is the person who raises a genuine concern in good faith relating to any of the above. If you have any genuine concerns relating to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy as per details below.

Raising A Whistleblowing Concern

We hope that in most cases you will be able to raise any concerns with one of the following:

- Nick Clarke – Partner, Chief Executive Officer and Executive Board Member
- Layla Barke-Jones – Partner, Compliance Officer for Legal Practice (COLP)
- Mark Bergin – Partner, Chief Operating Officer (COO), Executive Board Member
- Steve Marsh – Partner, Compliance Officer for Finance & Administration (COFA), EB Member
- Stephen Taylor – Partner, Money Laundering Reporting Officer (MLRO)
- Caroline King - HR Manager
- Helen Watson – Senior Partner and Employment Team Leader
- Hugh Strickland – Partner and Head of Shrewsbury

We will then look to arrange a meeting with you as soon as possible to discuss your concern. You may bring someone appropriate to any meetings under this policy (who obviously must respect the confidentiality of your disclosure and any subsequent investigation). At the meeting we will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

Confidentiality

We hope that individuals 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.

We do not encourage individuals to make disclosures anonymously as 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 seek advice from Public Concern at Work, the independent Whistleblowing Charity, who offers a confidential helpline. Their contact details are at the end of this policy.

External Disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In the vast majority of cases, you should not find it necessary to alert anyone externally.

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 to the business. Again, the independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

Whistleblowing concerns usually relate to the conduct of members of staff, but they may sometimes relate to actions of a third party, such as a client, supplier, service provider or other regulated firm or individual. The law allows you to raise a concern in good faith with the 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 team leader or one of the other individuals set out above for guidance.

Investigations And Outcomes

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.

In some cases, we may appoint an investigator, or team of investigators, including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

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.

If You Are Not Satisfied

Whilst 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.

If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts listed above. Alternatively, you may contact Protect, who offer confidential advice and resource material. Contact details are set out at the end of this policy.

Protection And Support For Whistleblowers

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support individuals who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Whistleblowers 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. For certain disclosures, which are made in the



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public interest, individuals are afforded further protection by virtue of the Public Interest Disclosure Act (PIDA) 1998.

If you believe that you have suffered any detrimental treatment as a result of a disclosure, you should inform the COLP, COFA, COO or Senior Partner immediately. If the matter is not remedied, you should raise it formally using our grievance procedure.

Responsibility For The Success Of This Policy

Our COLP has overall responsibility for this policy and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

The COLP has day to day operational responsibility for this policy and must ensure that all managers and other staff who may deal with concerns or investigations under this policy receive regular and appropriate training.

The COLP, should review this policy from a legal and operational perspective at least once a year.

If you have any questions or queries about this policy, or any concerns, please contact our COLP, COFA, CEO, COO or SP.

Protect (Independent Whistleblowing Charity)

Helpline **020 3117 2520**

Website: <https://protect-advice.org.uk/>

Owner: JMD

Last reviewed: Mar 26

References: Lexcel 4.9 / IIP 2 / SAR n/a



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