

## Whistle-blowing policy

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### 1. Preamble

- 1.1 FCSA exists to raise standards and promote supply chain compliance for the temporary labour market, and we rigorously test our members against published compliance standards annually.
- 1.2 In order to uphold standards we have a complaints policy which enables stakeholders to raise matters of concern in relation to our members, which we may then investigate.
- 1.3 This whistle-blowing policy is intended to support FCSA's Complaints Policy in enabling stakeholders to report suspected or actual occurrences of illegal, unethical or inappropriate events without retribution.

### 2. Scope of policy

- 2.1 It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety in relation to an FCSA member.
- 2.2 FCSA recognises that there could be a detrimental impact (either personal or commercial) of making such a disclosure about an FCSA member, and this policy seeks to give assurances in relation to protecting the identity of the whistle-blower.
- 2.3 The Public Interest Disclosure Act, gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns.

### 3. Safeguards

- 3.1 This policy is designed to offer protection to anyone that discloses concerns about FCSA members provided that the disclosure is made:
  - in good faith
  - in the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety
- 3.2 FCSA will treat all such disclosures in a confidential and sensitive manner. The identity of both the individual and the identity of the business making the allegation will be kept confidential providing it does not hinder or frustrate any investigation.
- 3.3 Any supporting evidence submitted to FCSA will be retained confidentially such that the source of the information, whether an individual or business, cannot be identified.
- 3.4 Confidentiality will be maintained at all times, unless disclosure is required for legal reasons.
- 3.5 If, in the event of FCSA being legally obliged to disclose the identity of a whistle-blower, and the member (about whom the disclosure was made) retaliates against the whistle-blower (who reported an event in good faith), FCSA's Board will decide what disciplinary action should be taken against that member.

### 4. Untrue allegations

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual nor their business. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. Deliberately false allegations that are malicious or vexatious will not be tolerated.

### 5. Procedures for making a disclosure

Disclosures can be made verbally or in writing to FCSA's Chief Executive who may invoke FCSA's complaints procedure accordingly.