



The Victoria Inn - Threemilestone  
The Victoria Inn - Roche  
The Norway Inn – Perranarworthal

**“A warm welcome with pub grub - at our tables or delivered to yours”**

## WHISTLEBLOWING POLICY

### Our policy on whistleblowing

This document outlines the process for dealing with ‘whistleblowing’. Inn Cornwall Limited is committed to conducting its business with honesty and integrity and we expect all staff to maintain high standards. This policy makes it clear that all employees who feel it is their duty to disclose whistleblowing information have their complaints taken seriously, that confidentiality is respected and the alleged perpetrator is treated fairly. Any suspected wrongdoing should be reported as soon as possible.

### Who does this policy apply to?

This policy applies to Inn Cornwall Limited employees, directors, consultants, contractors, volunteers, interns and agency workers and they are all encouraged to report any concerns they may have about wrongdoing in accordance with this policy.

### What is whistleblowing?

The Public Interest Disclosure Act 1998 (commonly referred to as ‘Whistleblowing’) protects employees who raise legitimate concerns about specified matters. The ‘whistleblower’ should decide in their own mind whether the information discovered about another employee is serious enough to report. The legislation sets out the kinds of disclosure which may be protected, referred to as a ‘qualified disclosure’. A qualified disclosure is one which meets the following criteria:-

- A criminal offence has been committed, is being committed or is likely to be committed
- Inn Cornwall Limited, or a person has failed, is failing or is likely to fail to comply with a particular obligation
- A miscarriage of justice has occurred, is occurring or is likely to occur
- The health and safety of an individual has been, is being or is likely to be damaged
- The environment has been, is being or is likely to be damaged
- Information indicating the occurrence of the above has been, is being or is likely to be concealed.



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In practical terms, examples of the kind of disclosure include, but are not limited to:-

- Bribery, corruption, financial malpractice, irregularity or fraud
- Improper conduct, unethical behaviour or negligence
- Danger to health and safety or breaches of quality standards
- Any conduct likely to damage our reputation
- Breaches of competition law or anti-competitive practices
- Failure to comply with any legal obligation or regulatory requirements
- Unauthorised disclosure of confidential information.

Whistleblowing concerns will usually relate to the conduct of our employees, contractors or consultants, but they may sometimes relate to the actions of a third party, such as a customer or an outsourced service provider. If so, we encourage you to raise with us any concerns you may have about such a third party in exactly the same way.

### **Protection and confidentiality**

We hope that staff will feel able to voice whistleblowing concerns openly under this policy. It is understandable that whistleblowers are sometimes worried about possible repercussions. We encourage openness and we will support employees who raise any genuine concern, even if they turn out to be mistaken. Your belief must be reasonable, but it need not be correct, although if the allegations are malicious, vexatious, or made for personal gain disciplinary action may be taken against that employee. Employees will not suffer any detrimental treatment because they have raised a genuine concern.

Completely anonymous disclosures are difficult to investigate. Confidentiality will be maintained during the investigatory process to the extent that this is practical and appropriate in the circumstances.

### **How to whistleblow**

The 'whistleblower' should be certain that the disclosure is made in good faith, demonstrating a reasonable belief that the allegations are substantially true. We hope that in many cases you will be able to raise any concern you have with your line manager. 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. However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact an alternative manager, or the owner of the public house.



We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

We will prepare 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.

We will carry out an initial assessment to determine the scope of any investigation and consider what subsequent action is required. You may be asked to attend further meetings in order to provide additional information.

Where appropriate, we will inform you of the outcome of our assessment. However, the need for confidentiality may prevent us giving you specific details of the investigation or any subsequent disciplinary action. Any information you are given must be treated as confidential.

Inn Cornwall Limited is committed to taking appropriate action with respect to all qualifying disclosures which are upheld. Therefore, as deemed necessary, disclosures may be referred onto the St Austell Brewery Company Limited, Financial Conduct Authority (FCA), the police, or other public authority, regulator or government department or agency exercising statutory powers (including any such bodies in any applicable overseas jurisdiction).

### **External channels for reporting concerns**

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. The Act sets out a number of prescribed bodies or persons to which qualifying disclosures may be made and you are within your rights to contact a relevant governing body. We strongly encourage you to seek advice before reporting a concern to anyone externally.

*Policy updated March 2021*

*Mark Holden – Company Director*

