Whistleblowing Policy

1. Purpose and scope

NRP encourages concerns about wrongdoing to be raised safely and promptly. This policy is available to supplied employees, workers, self-employed contractors and sub-contractors, including those whose engagement has ended. It covers concerns involving NRP, agencies, hirers and the wider supply chain. Internal NRP staff use the relevant staff procedure.

In Great Britain, the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998 and subsequent legislation, protects qualifying whistleblowers. Employees and many workers, including agency workers, have statutory protection. Some contractors also qualify under extended definitions; genuinely self-employed people are not automatically protected. NRP's reporting route and commitment against retaliation apply to everyone covered by this policy. The policy is non-contractual and does not change employment status or reduce legal rights.

2. What to report

Report information you reasonably believe shows a criminal offence, breach of a legal obligation, miscarriage of justice, danger to health or safety, environmental damage, sexual harassment, or deliberate concealment of any of these. Wrongdoing may be past, current or likely to occur, including overseas. Examples include payroll fraud, unlawful deductions affecting others, bribery, exploitation, unsafe assignments or safeguarding failures.

Statutory protection requires a reasonable belief that the disclosure is in the public interest and tends to show qualifying wrongdoing, together with the requirements for the reporting route used. You do not need conclusive proof or to investigate personally. A personal grievance may also be whistleblowing where the legal tests are met. Use the Grievance or Complaints Procedure for purely personal matters, but NRP will not reject a qualifying disclosure because it was raised under another procedure or overlaps an earlier complaint.

3. How to raise a concern

Contact NRP Compliance at info@newredplanet.com or 0161 7131730 and state that you wish to raise a whistleblowing concern. Reports may be oral or written. Explain what happened, relevant dates, who is involved and any information already available. Ask for an uninvolved director if a referred employee is implicated; if the Managing Director is implicated, request another uninvolved director or an independent investigator. You may use an appropriate external reporting route without internal permission.

You do not have to report through the agency or hirer first. Communication support or an alternative accessible reporting method can be requested. Anonymous reports will be assessed on their substance and available information, although anonymity may limit investigation and feedback. Do not obtain evidence unlawfully or put yourself or others at risk. For immediate danger, use emergency services and appropriate site or safeguarding arrangements.

4. Investigation and feedback

NRP will acknowledge a report as soon as practicable, normally within five working days where contact details are available, assess urgency and appoint an appropriately independent investigator. We will agree contact arrangements, explain likely timescales and provide reasonable updates. You may be asked for clarification and may request a companion or support at meetings. Statutory accompaniment rights apply where relevant proceedings engage them.

NRP will investigate fairly, protect evidence and consider referrals to regulators or police where appropriate. Information will be shared only where necessary; absolute confidentiality cannot be guaranteed. Where possible, we will explain any need to disclose your identity in advance. We will provide an appropriate outcome summary, subject to others' privacy and legal restrictions, and take corrective action where justified. If dissatisfied, request review by an uninvolved director. Records will be secured and retained only as necessary under applicable data-protection law.

5. Protection against retaliation

NRP prohibits retaliation for a protected disclosure or an honestly held concern under this policy, even if unsubstantiated. Retaliation includes threats, bullying, reduced hours, withheld work, adverse references or ending an engagement because a concern was raised. Report suspected retaliation promptly using the contacts above. NRP will address it with the agency or hirer where relevant and take appropriate protective action.

Good faith is not a statutory condition for a protected disclosure. Deliberately fabricated information may lead to a fair employee disciplinary process or appropriate contractual action for others; an unproven concern, repetition, criticism or disagreement with findings does not itself establish dishonesty. No confidentiality term or internal rule prevents a lawful protected disclosure.

6. External advice and reporting

You may seek confidential advice from a legal adviser, Acas or the independent charity Protect (protect-advice.org.uk). You do not have to exhaust this procedure before making a lawful external disclosure. Different legal conditions apply to external routes. A relevant prescribed person may include HMRC, the Health and Safety Executive or the Care Quality Commission, depending on the concern and their remit. Check the current GOV.UK list of prescribed people and bodies. Wider disclosures, including to the media, have stricter protection requirements; obtain independent advice.

The Board oversees this policy and NRP Compliance reviews its effectiveness, training needs and reporting arrangements at least annually.

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Reviewer: Phil Whelan

MD, New Red Planet