



JGA Whistleblowing and Protected Disclosures Policy

1. Purpose and legal framework

JGA Recruitment is committed to maintaining an open, ethical and accountable workplace in which workers can raise concerns about wrongdoing without fear of retaliation. This policy explains how concerns may be raised, how they will be handled, and the protections available to those who make protected disclosures.

This policy reflects the whistleblowing provisions of the Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998 and subsequent legislation in force in Great Britain as at August 2026. It also takes account of current UK Government and Acas guidance.

Nothing in this policy prevents a worker from making a protected disclosure to an appropriate external body where the statutory conditions for protection are met.

2. Scope

This policy is intended primarily for workers who may qualify for statutory whistleblowing protection. Depending on the circumstances, this can include employees and certain other categories of worker covered by the Employment Rights Act 1996. JGA Recruitment may also consider concerns raised by contractors, candidates, clients, suppliers and other stakeholders under this procedure where appropriate, although use of this internal procedure does not itself confer statutory whistleblowing protection.

3. What is whistleblowing?

Whistleblowing is the disclosure of information about wrongdoing where the person making the disclosure reasonably believes that the matter is in the public interest and tends to show that one or more legally recognised types of wrongdoing has occurred, is occurring, or is likely to occur.

- a criminal offence;
- a failure to comply with a legal obligation;
- a miscarriage of justice;
- danger to the health or safety of any individual;
- damage to the environment;
- sexual harassment; or
- the deliberate concealment of information tending to show any of the above.

A concern does not have to be proved before it is raised. A worker should have a reasonable belief in the information being disclosed and that the disclosure is in the public interest.



4. Whistleblowing and personal grievances

Whistleblowing is different from a personal grievance. A complaint concerning an individual's own employment position, such as a disagreement about pay, working arrangements, treatment by a manager or another personal employment matter, will normally be handled under JGA Recruitment's grievance procedure unless the concern also raises wrongdoing in the public interest.

Where a concern contains both whistleblowing and grievance elements, JGA Recruitment may deal with the different elements under the appropriate procedures and will explain this to the person raising the concern.

5. How to raise a concern

Workers are encouraged to raise concerns as soon as reasonably practicable. A concern may be raised verbally or in writing. It should provide, where possible, the nature of the concern, relevant dates, people involved, supporting information and any steps already taken.

A concern should normally be raised with the worker's line manager or another appropriate senior manager. If the worker believes that route is inappropriate, including because that person may be involved in the matter, the concern should be raised with the person designated by JGA Recruitment Group Ltd to oversee whistleblowing.

JGA Recruitment should maintain and communicate current contact details for its designated whistleblowing contact and any confidential reporting channel. Those operational contact details may be published separately so that they can be kept current without requiring this policy to be reissued.

6. Confidential and anonymous disclosures

JGA Recruitment will take reasonable steps to protect the identity of a person who raises a concern and will limit disclosure of identifying information to those who need it for the proper handling, investigation or resolution of the matter, or where disclosure is otherwise required by law.

A person raising a concern should say if they want their identity to be kept confidential. Absolute confidentiality cannot be guaranteed in every case, for example where disclosure is legally required or is necessary for a fair investigation, but JGA Recruitment will discuss this with the person where reasonably possible.

Anonymous concerns will be considered. However, anonymity can make it more difficult to investigate a concern, seek clarification, assess credibility or provide feedback. Workers are therefore encouraged, where they feel able to do so, to provide a confidential means of contact.



7. Protection from detriment and retaliation

JGA Recruitment will not tolerate retaliation against a person because they have raised a genuine concern or made a protected disclosure. Statutory protection may include protection against dismissal and other detriment where the legal requirements for a protected disclosure are met.

Examples of prohibited retaliation include dismissal, disciplinary action, demotion, threats, intimidation, harassment, exclusion, disadvantage in work allocation or opportunities, or other adverse treatment because a person raised a protected concern.

Any worker who believes they have suffered retaliation should report it promptly to a senior manager or the designated whistleblowing contact. Retaliation may result in disciplinary action, up to and including dismissal where appropriate.

8. Handling and investigation of concerns

JGA Recruitment will acknowledge a concern as soon as reasonably practicable and make an initial assessment to determine how it should be handled. The person dealing with the matter should be sufficiently independent from the issues raised.

Depending on the circumstances, the matter may be investigated internally, referred to an appropriately independent person, or referred to an external regulator, law-enforcement body or other competent authority.

Investigations will be conducted fairly, proportionately and without unreasonable delay. The whistleblower may be asked for further information. JGA Recruitment will aim to keep the whistleblower appropriately informed of progress and, where possible, the outcome, subject to confidentiality, data protection, legal privilege and the rights of other people involved.

No person who is the subject of an allegation will be treated as having committed wrongdoing merely because a concern has been raised. Investigations will be impartial and those affected will be treated fairly.

9. Concerns that are mistaken or knowingly false

A worker will not be penalised merely because a concern raised in accordance with this policy turns out to be mistaken. However, deliberately making allegations known to be false, or acting maliciously in a way that constitutes misconduct, may be dealt with under the appropriate disciplinary procedure. This does not remove statutory protection from a disclosure that otherwise qualifies for protection under the law.



10. External disclosures

JGA Recruitment encourages workers to use the internal procedure where appropriate, but recognises that the law permits protected disclosures to be made outside the organisation in certain circumstances.

A worker may make a disclosure to a relevant 'prescribed person' or body where the statutory conditions are met. The current list of prescribed persons and the matters for which they are prescribed is published by the UK Government. A worker should ensure that the chosen prescribed person is appropriate for the subject matter of the concern.

Disclosures to other third parties, including the media or on social media, are subject to more stringent legal conditions and will only be protected in limited circumstances. Workers may wish to obtain independent legal advice before making an external disclosure.

Nothing in this policy requires a worker to report a concern internally first where the law permits them to make a protected disclosure through another appropriate route.

11. Records and data protection

Records relating to whistleblowing concerns will be kept securely, with access limited to those who need the information for legitimate purposes. Personal information will be handled in accordance with applicable data protection law and JGA Recruitment's data protection and retention requirements.

12. Training and awareness

- JGA Recruitment will make workers aware of this policy and the available reporting routes.
- Managers and others responsible for receiving concerns will receive appropriate guidance or training.
- Those handling disclosures must understand the importance of impartiality, confidentiality, data protection and protection from retaliation.
- The organisation will periodically review whether its reporting arrangements are accessible and effective.

13. Breach of confidentiality or retaliation

Unauthorised disclosure of confidential whistleblowing information, interference with an investigation, or retaliation against a person for raising a protected concern may constitute misconduct and may result in disciplinary action, up to and including dismissal or termination of contract where appropriate. Legal or regulatory action may also arise where applicable.



14. Review and responsibility

This policy will be reviewed at least annually and sooner where there is a material change in legislation, regulatory guidance or JGA Recruitment's reporting arrangements. Responsibility for maintaining the policy should be assigned to an appropriate senior person within JGA Recruitment.

15. Further information

Current information about whistleblowing rights and prescribed persons is available from GOV.UK and Acas. Workers may also seek independent legal advice about their individual circumstances.

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