

People Policies and Procedures

WHISTLEBLOWING

Our goal is to have engaged and helpful colleagues who will deliver ever improving customer service.



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1. INTRODUCTION

Whistleblowing is where a colleague raises a concern about underhand or illegal practices within Manchester Airports Group or an associated company. The Company is committed to maintaining an open culture with the highest standards of honesty and accountability, where colleagues can report any genuine concerns in confidence.

This document sets out the procedure by which you can report any concerns. Provided you do so in good faith, you will be protected under the Public Interest Disclosure Act against any detriment as a result of doing so.

2. SCOPE

The procedure applies to all employees within Manchester Airports Group.

It may be used where you believe there is or has been:

1. A criminal offence;
2. A failure to comply with legal obligations;
3. A miscarriage of justice;
4. A health and safety danger;
5. An environmental risk; (or)
6. A deliberate concealment of any of these.

This procedure is used to raise concerns where the interests of others or of the Company itself are at risk.

It's not designed for individuals to publicly question, or publicise, financial or business decisions taken by the Company. Neither may it be used to obtain a hearing or rehearing of matters for which there are other Company procedures, for example the grievance or appeals procedures.

If you're concerned about your personal position, you should use the Grievance Procedure or the Dignity at Work Procedure.

3. PROCEDURE

3.1 Considering your concern

You may be unsure about raising the issue that is troubling you or may want to keep the concern to yourself, perhaps feeling it's none of your business or that it's only a suspicion. You may feel that raising the matter would be disloyal to colleagues, managers or to the airport. You may decide to say something but wonder who to speak to or how to raise the matter.

We have introduced this procedure to enable you to raise your concerns about such matters at an early stage and in the right way. We would rather that you raised the matter once you become aware of the concern rather than wait for proof, by which time the situation may have become more serious.

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You won't be expected to have absolute proof, but will need to be able to show the reasons for your concern. It doesn't matter if your concerns subsequently turn out to be mistaken, provided you've raised them in good faith.

3.2 Raising your concern informally

If you have a concern, where possible, it should be raised with your manager informally in the first instance.

Your manager will:

- take your concern seriously;
- consider it fully and sympathetically;
- recognise that raising a concern can be a difficult experience for you;
- seek advice from specialist managers/professional leads where appropriate.

If you're worried that you may breach confidentiality simply by raising a concern, you may wish to discuss the matter initially without 'naming names'.

Where your concern can be acted upon, action will be taken promptly and your manager will notify you of this. Your manager will agree with you the timescale within which he will take action. Where action isn't considered appropriate, you will be given a prompt and thorough explanation of the reasons for this.

Whilst this informal stage is underway it isn't appropriate for you to raise the matter, separately, with others or to escalate it up the management chain.

3.3 Raising your concern formally

If the matter you've raised is unresolved or is serious enough to warrant reporting it immediately, you should notify the most appropriate senior manager in your function.

The matter will then be investigated. The person investigating the issue raised will try to investigate it thoroughly and conclude the matter promptly. You should recognise, however, that this might take some time depending on the nature of the issue. You'll be kept informed, as far as is practicable, of the continuing process. If you're concerned that the matter is being prolonged you should discuss this with the person who is investigating.

The Company will not subject anyone who makes a sincere report under this procedure to any detriment as a result. In the unlikely event that you consider that you're being subjected to such a detriment, you must inform the investigating person immediately (if the investigation is ongoing) and use the Grievance Procedure.

If you remain dissatisfied with the action taken or if your senior manager is the subject of your concern, the matter may be referred to the Executive Committee.

If you feel unable to contact anyone internally, you may contact SAFECALL on 0870-2410762. Safecall is an independent organisation specialising in dealing with such situations to whom you may make a completely confidential disclosure. They will then provide whatever information you have disclosed to their contact within MAG - the Head of Risk Assurance. This manager has the remit to act completely independently in following up on the issue you have raised. He has full access to every level of the business to investigate the matter and apply his discretion on how it should be resolved. Impartiality is guaranteed

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and your confidentiality is assured because you can state when you speak with Safecall what can be disclosed and what you want them to withhold. Obviously, the more information you can provide whilst still protecting your confidentiality, the better the chances of a successful investigation by the Head of Risk Assurance.

4. RELATED MATTERS

4.1 Confidentiality

We will not tolerate the harassment or victimisation of anyone for raising a genuine concern. Therefore we hope that concerns can be brought to our attention without the need to conceal the identity of the person raising the matter. However, we recognise that you may nonetheless want to raise a concern in confidence under this policy. If you ask us to protect your identity we'll do so unless a situation arises in which we're unable to resolve the concern without disclosing it, for example if your evidence is needed in court or at a disciplinary hearing. In this case we'll discuss with you how to proceed.

You're strongly encouraged to put your name to any disclosure you make, since part of the purpose of this policy is to promote openness and discourage a fear of reprisals. Concerns expressed anonymously are much less powerful and far less capable of being addressed - they will be considered at the Company's discretion.

The unauthorised disclosure of confidential information concerning colleagues will be managed within the disciplinary procedure.

If you disclose the matter publicly following an anonymous allegation to the Company you may not be protected by the Act.

4.2 Representative and Professional Organisations

At all stages of this procedure, you're entitled to consult, seek guidance and support from your professional organisation or trade union or from statutory bodies.

4.3 Disclosure Outside the Company

Any disclosures must be made to the Company within this procedure unless you reasonably believe one of the following:

- you will suffer a detriment;
- evidence will be destroyed (or)
- you have previously made a similar disclosure to the Company and no action was taken.

If you're considering making a disclosure to an outside source (other than Safecall) before doing so you should seek further specialist guidance from your professional or other representative bodies or your trade union. Where appropriate you might also discuss it with your manager and professional body.

The Public Interest Disclosure Act does not give employees automatic protection for leaking things to the Press.

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4.4 Untrue Allegations

Where an allegation is found to be untrue and not made in good faith, for example for malicious reasons, to pursue a personal grudge or for personal gain, the person making the allegation will be managed within the Disciplinary Procedure.

If a colleague continues to make untrue allegations when they have been declared after investigation to be without foundation, s/he will be managed within the disciplinary procedure.

4.5 Reprisals

If a colleague who has made a disclosure suffers reprisals or victimisation from other colleagues as a result of doing so, the other colleague'(s)' actions will be managed within the disciplinary procedure.

5. REVISION HISTORY

Date	Revision Description	Revised By
01/03/09	MAG issue for Manchester and Bournemouth	Nikki Wollerton
03/08/09	MAG issue for EMA	Nikki Wollerton
01/03/10	MAG issue for Humberside	Nikki Wollerton

This procedure is approved by:
John Hampton, Director of Group Reward & Employment Policy