

Whistleblowing Policy

AJ Chambers is committed to conducting its business with integrity, transparency and high ethical standards.

We want everyone working with or for AJ Chambers to feel able to speak up where they reasonably believe that wrongdoing has occurred, is occurring, or is likely to occur.

AJ Chambers will take concerns raised under this policy seriously and will not tolerate retaliation, victimisation, bullying, harassment, dismissal or any other detrimental treatment because someone has raised a genuine concern or made a protected disclosure.

This policy explains:

- what whistleblowing is
- the types of concerns that can be raised
- how to raise a concern
- how AJ Chambers will respond
- the protection available to whistleblowers
- the specific protection applying to disclosures concerning sexual harassment and
- how concerns can be raised externally where appropriate

This policy reflects the Employment Rights Act 1996, the Public Interest Disclosure Act 1998, the Equality Act 2010, the Worker Protection (Amendment of Equality Act 2010) Act 2023 and relevant provisions of the Employment Rights Act 2025.

Who this policy applies to

This policy applies to everyone working for or with AJ Chambers where relevant, including:

- employees
- workers
- contractors and consultants
- apprentices
- work-experience placements; and

- former workers where they wish to raise a concern relating to their work with AJ Chambers.

AJ Chambers also encourages candidates, clients, suppliers and other business contacts to raise concerns about serious wrongdoing connected with our organisation.

The precise statutory whistleblowing protection available to an individual will depend upon their employment status and the circumstances of their disclosure.

What is whistleblowing?

Whistleblowing is the reporting of information about wrongdoing which an employee reasonably believes is in the public interest.

Legally, this can amount to a protected disclosure where the requirements of the Employment Rights Act 1996 are satisfied.

A person does not need to prove that wrongdoing has taken place before raising a concern. They should, however, have a reasonable belief that the information they are disclosing tends to show relevant wrongdoing.

AJ Chambers encourages concerns to be raised as early as possible. Early reporting gives us the best opportunity to investigate, prevent harm and take appropriate action.

What can be reported under this policy?

A whistleblowing concern may relate to wrongdoing that has happened, is currently happening, or is likely to happen.

Examples include information tending to show:

- a criminal offence
- fraud, bribery, corruption, theft or financial misconduct
- a failure to comply with a legal obligation
- a miscarriage of justice
- a danger to the health or safety of any individual
- environmental damage
- sexual harassment

- deliberate concealment of information relating to any of the above
- serious regulatory or compliance failures
- serious misuse of company funds, systems or resources
- falsification of records
- serious breaches of professional or regulatory requirements
- unlawful discrimination or harassment where the disclosure otherwise meets the requirements for whistleblowing protection or
- serious misconduct or unethical behaviour which engages one of the statutory categories of wrongdoing

Sexual harassment and whistleblowing

Sexual harassment means unwanted conduct of a sexual nature which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

A disclosure may concern sexual harassment that:

- has already occurred
- is currently occurring or
- is likely to occur

It may concern the person raising the concern, another employee or a wider workplace practice or culture.

For statutory whistleblowing protection to apply, the relevant legal requirements must still be satisfied, including the requirement that the employee reasonably believes the disclosure is in the public interest.

AJ Chambers will nevertheless take concerns about sexual harassment seriously even where they do not ultimately qualify as protected disclosures under whistleblowing legislation.

Recruitment-specific examples

As a recruitment business, AJ Chambers recognises that wrongdoing may arise not only between colleagues but through interactions with candidates, clients and other third parties.

Concerns that should be raised may include, for example:

- a consultant becoming aware of repeated sexual harassment of candidates or employees by a client
- inappropriate sexual comments or behaviour towards an AJ Chambers employee during a client meeting or event
- a candidate reporting serious or repeated sexual harassment within a client organisation
- an employee being pressured to ignore or conceal discriminatory recruitment practices
- manipulation or falsification of candidate, placement, compliance or financial records
- bribery or improper inducements connected with placements
- unlawful discrimination in recruitment or selection
- deliberate breaches of legal or regulatory requirements
- serious misuse of candidate or client confidential information
- serious data protection or privacy breaches
- health and safety risks affecting AJ Chambers employees, candidates, contractors or others
- retaliation against someone who has reported sexual harassment, discrimination or another protected concern or
- attempts to cover up any such wrongdoing

No employee will be expected to tolerate sexual harassment, discriminatory behaviour or other serious misconduct because the individual responsible is an important client, candidate or any other 3rd party contact.

Whistleblowing versus a personal grievance

Whistleblowing is generally concerned with wrongdoing which is reasonably believed to be in the public interest.

A personal complaint relating solely to an individual's own employment circumstances for example, disagreement about their pay, performance rating or working arrangements will usually be more appropriately dealt with under AJ Chambers' Grievance Procedure.

However, the distinction is not always straightforward.

A concern may be both a personal complaint and a whistleblowing disclosure. This can be particularly relevant to complaints concerning sexual harassment, discrimination, health and safety or wider unlawful practices.

AJ Chambers will consider the substance of the concern rather than simply the label attached to it.

Where appropriate, a matter may be considered under both this policy and another procedure.

Employees will not lose protection simply because they initially raised their concern through the "wrong" internal procedure.

Sexual harassment and AJ Chambers' preventative duties

AJ Chambers has a positive legal duty to take steps to prevent sexual harassment at work.

We will take a proactive and preventative approach rather than waiting for an incident or complaint to occur.

This includes considering risks arising from:

- colleagues
- managers and senior leaders
- clients
- candidates
- suppliers and contractors
- networking events
- client entertainment

- conferences and industry events
- work-related social events
- business travel
- alcohol-related work events
- messaging applications
- social media
- email and other electronic communications and
- remote working

AJ Chambers will keep its sexual harassment risk assessment and preventative measures under review.

AJ Chambers will prepare for and apply the strengthened statutory requirements taking effect from 30 October 2026, including the requirement to take all reasonable steps to prevent sexual harassment of employees.

The strengthened regime also introduces protection concerning harassment by third parties. AJ Chambers will therefore take appropriate preventative action concerning risks arising from clients, candidates, suppliers and other third parties with whom employees interact in the course of their employment.

Preventative measures may include:

- regular sexual harassment risk assessments
- clear anti-harassment policies
- mandatory and refreshed training
- manager training
- effective reporting channels
- appropriate investigation procedures
- monitoring workplace culture and risk
- clear expectations for clients and other third parties
- intervention where inappropriate behaviour is identified
- reviewing risks associated with social and client events and
- periodically reviewing whether existing controls are working effectively

How to raise a concern

AJ Chambers encourages concerns to be raised as soon as reasonably possible.

A concern may initially be raised with:

Head of People

Managing Director

Line Manager

Senior Management / Director

Concerns may be raised verbally or in writing

What information should be provided?

A whistleblower is not required to investigate the matter themselves or prove that wrongdoing has occurred.

Where possible, it is helpful to provide:

- the nature of the concern
- relevant dates
- the people or organisations involved
- where the incident occurred
- whether it is ongoing
- details of any witnesses
- any relevant documents or communications
- whether the concern has previously been reported and
- whether there is any immediate risk to an individual

A lack of documentary evidence will **not** prevent AJ Chambers from considering or investigating a concern.

Anonymous disclosures

AJ Chambers encourages individuals to identify themselves when raising concerns because this can make it easier to investigate and provide feedback.

However, concerns may be raised anonymously.

Anonymous concerns will be considered seriously and investigated as far as reasonably possible.

Individuals should be aware that anonymity may make it more difficult to:

- obtain additional information
- conduct a full investigation
- verify particular allegations or
- provide feedback about the outcome

Confidentiality

AJ Chambers will treat whistleblowing disclosures sensitively.

Where an individual asks for their identity to remain confidential, we will take reasonable steps to protect their identity.

Absolute confidentiality cannot always be guaranteed. Disclosure may sometimes be necessary, for example to conduct a fair investigation, comply with legal obligations or enable another person to respond properly to allegations.

Where it becomes necessary to disclose the whistleblower's identity, AJ Chambers will, where reasonably practicable and lawful, discuss this with them beforehand.

Information will be shared only with those who reasonably need it.

What happens after a concern is raised?

AJ Chambers will normally:

1. acknowledge the concern as soon as reasonably practicable
2. appoint an appropriate person to conduct an initial assessment
3. consider any immediate safeguarding, wellbeing or workplace measures required
4. determine whether the matter falls under this policy and/or another AJ Chambers procedure
5. determine whether a formal investigation is required
6. ensure that the investigator is appropriately independent and has no material conflict of interest
7. conduct the investigation fairly and sensitively
8. keep appropriate records
9. consider whether external reporting to a regulator, authority or the police is necessary and
10. provide appropriate feedback to the whistleblower where possible.

Particular care will be taken where the concern relates to sexual harassment.

AJ Chambers will not dismiss or minimise a sexual harassment concern because:

- there were no witnesses
- the alleged perpetrator is senior or commercially important
- the behaviour occurred at a social event
- alcohol was involved
- the behaviour occurred outside the office
- the behaviour occurred electronically
- the individual did not object immediately or
- there has been a delay in reporting it

Investigation

The nature and extent of any investigation will depend upon the circumstances.

The investigator may:

- meet with the person raising the concern
- interview witnesses
- review emails, messages, documents and other records
- speak to the person or people who are the subject of the allegations
- consider whether other employees may have experienced similar conduct
- consider whether the issue indicates a wider cultural or systemic problem and
- recommend corrective, disciplinary, safeguarding or preventative action.

Investigations will be conducted objectively and with appropriate regard to confidentiality, data protection and procedural fairness.

Protection against retaliation and detriment

AJ Chambers will not tolerate retaliation against anyone who raises a genuine concern.

An employee who makes a protected disclosure has statutory protection against suffering a detriment because of that disclosure.

Examples of prohibited retaliation may include:

- dismissal
- threats of dismissal
- demotion
- loss of responsibilities
- reduced hours without proper reason
- withholding promotion or training opportunities
- bullying
- harassment
- intimidation
- exclusion or ostracism

- adverse changes to working arrangements
- threats
- damage to career prospects
- unfavourable treatment concerning pay or benefits or
- deliberately damaging an individual's professional reputation

Any employee who victimises or retaliates against a person because they raised a concern may be subject to disciplinary action, potentially including dismissal for gross misconduct.

Anyone who believes they have experienced retaliation should report it immediately to their Head of People or a Director.

Support for individuals raising concerns

AJ Chambers recognises that raising a serious concern can be difficult.

We will consider appropriate support on a case-by-case basis, which may include:

- access to HR
- Employee Assistance Programme support
- adjustments to working arrangements
- steps to prevent contact between relevant individuals where appropriate
- wellbeing meetings
- signposting to external support

Support measures will not be treated as a substitute for properly investigating the underlying concern.

Concerns raised in good faith that are not substantiated

An individual will not face disciplinary action merely because a concern they genuinely raised is ultimately not substantiated.

A whistleblower does not need to prove their allegation before raising it.

Knowingly making deliberately false or malicious allegations is different and may result in disciplinary action.

Care must be taken before concluding that a concern was deliberately false. A concern being unsubstantiated does **not**, by itself, mean that it was malicious.

External disclosures

AJ Chambers encourages employees to use internal reporting arrangements where they feel able to do so, as this can give us an opportunity to investigate and address the matter promptly.

However, the law recognises circumstances in which protected disclosures may be made outside the organisation.

Depending on the subject matter and applicable statutory conditions, disclosures may be made to an appropriate prescribed person or body, such as a relevant regulator.

Individuals may also seek independent advice from:

- Acas
- Protect, the whistleblowing charity
- Citizens Advice or
- an independent legal adviser

Criminal conduct and the police

Nothing in this policy prevents an individual from reporting suspected criminal conduct to the police.

Some forms of sexual harassment may also constitute criminal offences.

AJ Chambers will not require an employee to obtain the company's permission before reporting suspected criminal conduct to the police.

Confidentiality clauses and NDAs

Nothing in an AJ Chambers employment contract, settlement agreement, confidentiality agreement, non-disclosure agreement or other arrangement is intended to prevent an employee from making a protected disclosure.

AJ Chambers will not use a confidentiality provision to prevent lawful whistleblowing.

In particular, confidentiality provisions must not be used to prevent someone from making a protected disclosure concerning sexual harassment.

Third-party harassment

AJ Chambers recognises that recruitment employees can have significant contact with people outside the organisation.

Employees should therefore report harassment or other serious inappropriate conduct involving:

- clients
- prospective clients
- candidates
- suppliers
- contractors
- visitors
- networking contacts or
- any other third party encountered through work

AJ Chambers will not expect an employee to continue interacting with a third party in circumstances that expose them to an unacceptable risk of harassment.

Where appropriate, action may include:

- raising the matter with the client or third party
- changing the employee's point of contact
- restricting contact
- requiring particular standards of behaviour

- removing an employee from an unsafe situation
- ending a commercial relationship in serious cases or
- reporting conduct to an appropriate authority.

Revenue, fees, client status or commercial importance will not override AJ Chambers' responsibility to protect its employees.

Managers' responsibilities

Managers have a particular responsibility to create an environment in which people feel able to speak up.

Managers must:

- take concerns seriously
- listen without prejudging the issue
- avoid dismissive or discouraging comments
- escalate potential protected disclosures promptly
- maintain confidentiality
- not attempt to investigate serious allegations informally without appropriate HR guidance
- be alert to retaliation
- take concerns about sexual harassment particularly seriously
- ensure commercial pressures do not influence how concerns are treated and
- cooperate fully with investigations.

Managers must not ask someone whether they are "sure" they want to proceed in a way that could discourage them from raising a concern.

Training and awareness

AJ Chambers will provide appropriate whistleblowing and anti-harassment information and training.

Relevant training will include:

- recognising a potential protected disclosure
- the protection available to whistleblowers
- recognising sexual harassment
- bystander awareness and intervention
- dealing with complaints sensitively
- confidentiality
- avoiding victimisation and retaliation
- third-party harassment risks
- appropriate conduct at client and social events and
- managers' responsibilities when receiving a concern

Training will be refreshed periodically and when material legal or policy changes occur.

Monitoring and governance

AJ Chambers will periodically review whistleblowing information to identify trends and opportunities to improve workplace culture.

Appropriate senior management information may include:

- number and nature of concerns
- themes or recurring issues
- time taken to investigate
- outcomes
- instances of alleged retaliation
- sexual harassment concerns
- third-party concerns
- lessons learned and

- preventative actions taken.

Information used for monitoring purposes will be appropriately anonymised where possible.

Senior management will ensure that significant issues are acted upon and that the effectiveness of this policy is reviewed.

Record keeping and data protection

Records relating to whistleblowing concerns will be handled securely and in accordance with applicable data protection legislation and AJ Chambers' data protection and retention policies.

Access will be limited to those who have a legitimate need to know.

Whistleblowing records will be sufficiently detailed to demonstrate that concerns have been appropriately assessed, investigated and addressed.

Policy status

This policy does not form part of any employee's contract of employment and AJ Chambers may amend it from time to time.

Nothing in this policy limits any statutory rights available to employees.

Where there is any conflict between this policy and applicable legislation, the legislation will take precedence.

Review

This policy will be reviewed:

- at least annually
- following a serious whistleblowing or sexual harassment incident
- following material changes in legislation or statutory guidance
- following updated EHRC, Acas or Government guidance or
- where monitoring or risk assessments indicate that changes are required.

Key internal contacts**Head of People:**

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