



Whistleblowing Policy

23 April 2025

Our ref: Modern Slavery Statement
FY24/25

Jacob Archer

Policy Statement

Thurstan Hoskin Solicitors LLP is committed to the highest standards of openness, integrity and accountability. As part of that commitment, we encourage staff and third parties to speak up if they have concerns about wrongdoing, risk, or malpractice within the firm. This policy sets out how individuals can raise concerns confidentially and without fear of retaliation.

Purpose

The purpose of this policy is to:

- Enable and encourage staff and external parties to raise serious concerns internally
- Outline how concerns will be investigated and addressed
- Protect whistleblowers from reprisals or victimisation

Scope

This policy applies to:

- All employees (permanent, temporary, and contract)
- Partners and consultants
- Trainees, agency workers, volunteers, and interns
- Third parties including clients, suppliers, and contractors

What is Whistleblowing?

Whistleblowing is the disclosure of information about suspected wrongdoing or dangers in relation to our firm's activities. Examples include:

- Criminal offences (e.g. fraud, bribery)
- Breaches of legal or regulatory obligations
- Risk to health and safety or the environment
- Miscarriages of justice
- Deliberate concealment of any of the above

Personal grievances (e.g. bullying, harassment) should be raised under our grievance procedures.

Raising a Concern

Concerns should be raised as soon as possible, ideally in writing, with:

- Your line manager or supervising partner
- Our Compliance Partner (or MLRO if financial crime is suspected)
- Alternatively, concerns can be reported anonymously via the Solicitors Regulation Authority (SRA):
<https://www.sra.org.uk/consumers/problems/report-solicitor/whistleblowing-to-sra/>

Handling of Disclosures

All concerns will be taken seriously and investigated promptly. Investigations will be conducted fairly and sensitively. Confidentiality will be maintained as far as possible, but information may need to be disclosed to others on a need-to-know basis to investigate effectively.

We will:

- Acknowledge concerns within 5 working days
- Commence investigation within 10 working days
- Provide a response or update within 30 working days (or explain any delays)

Protection for Whistleblowers

We are committed to ensuring that whistleblowers are not subjected to any detrimental treatment as a result of raising a genuine concern. Any retaliation or victimisation will be treated as a disciplinary offence.

False or malicious disclosures made deliberately to harm individuals or the firm may lead to disciplinary action. However, no action will be taken against anyone who raises a concern in good faith, even if it is later found to be unfounded.

External Disclosures

In rare circumstances, and if internal channels have been exhausted or are inappropriate, concerns may be raised externally with regulators such as:

- The Solicitors Regulation Authority (SRA)
- The Legal Ombudsman
- HMRC (for financial crime)

Roles and Responsibilities

- **Compliance Partner:** Overall responsibility for whistleblowing matters
- **MLRO:** Point of contact for financial crime concerns
- **HR Lead:** Ensures whistleblowers are supported and protected

Record-Keeping and Oversight

All whistleblowing reports will be recorded in a secure register by the Compliance Partner. Periodic reviews will be carried out to identify trends, ensure consistent handling, and report findings (where appropriate) to the Partners.

Training and Culture

Whistleblowing awareness is included in staff induction and refreshed through annual compliance training. The firm is committed to fostering a culture where staff feel confident to raise concerns without fear.

Monitoring and Review

The effectiveness of this policy will be reviewed annually by the Compliance Partner. Any improvements or changes will be communicated to all staff. Feedback from staff on how the policy operates in practice is welcomed.

Approval

This policy was approved by the Partners of Thurstan Hoskin Solicitors LLP on 24/04/2025 and is reviewed annually.

**If you require this document
in an alternate format,
please call us on 01209 213
646.**