

Whistleblowing Policy

At Home Catering Limited

Policy reference	AHC-POL-WBL
Status	Version 1.1 – wording approved 17 October 2026 by John Walker and Christophe Perrier. Website publication and tender and buyer use authorised on 27 October 2026. Not yet in effect: approval and these authorisations do not make the policy operational
Approved wording on file	Version 1.1, approved 17 October 2026 by John Walker and Christophe Perrier jointly (Version 1.0 approved 13 August 2026)
Prepared	Wording prepared 16 October 2026; release edition generated 29 October 2026
Replaces, once published	The legacy Policy on Whistleblowing (policy date 2023- 2024, review date April 2025), which remains the published document until this policy is published in its place
Policy owners and approvers	John Walker and Christophe Perrier, jointly
Contact for this policy	Jessica Perrier – jessica@athomecatering.co.uk
Review	At least every 12 months once in effect, and earlier on a relevant change
Law checked	Against current official sources on 16 October 2026. Final legal review is still outstanding; no external legal advice has been obtained

1. Our commitment

We want people to speak up. Raising a genuine concern about wrongdoing is the right thing to do, and it protects our clients, our guests, our colleagues, the public and the business.

- Concerns are taken seriously, considered fairly and dealt with proportionately.
- Nobody is penalised for raising a genuine concern that turns out to be unsubstantiated. Being wrong is not misconduct.
- A deliberately and knowingly false allegation is a different matter and may be dealt with separately.
- An allegation is not proof, and nobody is presumed guilty.
- Detriment or retaliation against anyone who raises a concern, or who takes part in a related process, is not tolerated.

2. What this policy is for

Whistleblowing is usually about wrongdoing with a wider public-interest dimension. A concern purely about your own job is usually a grievance, although the same facts can sometimes amount to both. This policy explains what you can raise, how to raise it, the routes the law gives you outside the company, how we protect you from retaliation, and how a concern is handled.

3. Who can raise a concern

Our commitment is deliberately broad: we will accept and consider a genuine concern from anyone connected with our work. Statutory protection is narrower and is fixed by law, not by us – it applies to workers who make a protected disclosure. The two are not the same, and we would rather say so than imply a protection we cannot grant.

Who	Position
Employees	Covered by this policy, and protected by law where the statutory tests are met.
Zero-hours, casual and bank staff	Covered by this policy. Many are also workers in law, and so within the statutory protection.
Agency and freelance workers on our events	Covered by this policy while they are working with us. Agency workers are within the statutory protection in many cases.
Contractors, consultants, suppliers and their staff	We will consider their concerns under this policy. Genuinely self-employed people are not usually within the statutory protection.
Former staff	Covered by this policy. Statutory protection can continue after an engagement ends – for example where a reference is affected.
Anyone else connected with our work	We would rather hear a genuine concern than not hear it. Accepting a concern is our own commitment and does not itself create statutory protection.

Employment status is decided by law on the real facts of each relationship. This policy does not decide anyone's status. If you are unsure where you stand, you can take independent advice – from Acas, from Citizens Advice, or from your own adviser.

4. What you can raise

A disclosure can qualify for statutory protection where a worker discloses information which, in their reasonable belief, is made in the public interest and tends to show that:

- a criminal offence has been, is being, or is likely to be committed;
- someone has failed, is failing, or is likely to fail to comply with a legal obligation;
- a miscarriage of justice has occurred, is occurring, or is likely to occur;
- someone's health or safety has been, is being, or is likely to be endangered;
- sexual harassment has occurred, is occurring, or is likely to occur;
- the environment has been, is being, or is likely to be damaged;
- information tending to show any of the above has been, is being, or is likely to be deliberately concealed.

Qualifying is only part of it. For the disclosure to be protected it must also be made in one of the ways the law allows – to us, in the course of getting legal advice, to a prescribed person or body, or, on more demanding conditions, more widely. Section 8 sets out those routes.

Three things matter more than the list. You do not need proof – a reasonable belief that the information tends to show the wrongdoing is enough, and you should never hold a genuine concern back because your evidence is incomplete. You do not need to be right – protection does not depend on the concern being substantiated. And “public interest” means the concern affects others, such as colleagues, clients, guests or the public, rather than being purely a private matter.

These are working explanations, not exhaustive legal definitions. Whether a particular disclosure is legally protected depends on the facts and on the statutory tests, and that is for a tribunal rather than for this policy. Not every report made under this policy is necessarily a protected disclosure in law – we will consider every genuine concern either way.

5. Whistleblowing and a personal complaint

- A grievance or personal employment concern is usually about your own pay, hours, conditions or treatment. It would normally be treated as an individual employment concern rather than as

whistleblowing alone.

- Whistleblowing is about wrongdoing that affects others or the wider public interest.
- A concern can be both. If yours contains a personal complaint and information about wider wrongdoing, raise it: we will consider each part through the right route, and the personal element does not disqualify the rest.
- Sexual harassment may be both a personal complaint and the subject of a qualifying disclosure. Both routes are open, and using one does not close the other.
- Nobody has to choose a single route where more than one applies. Where several apply we coordinate the handling so that nothing is lost and nobody is put through duplicate or conflicting processes.

Nothing in this policy reduces anyone's rights under the Equality Act 2010 or any other statutory protection or reporting route.

6. Examples from our own work

Illustrative only. None of these is a statement that any such thing has happened at At Home Catering Limited:

- food-safety failures, or food-safety or hygiene records that have been falsified;
- allergen-handling failures, or allergen information that is misrepresented to a client or guest;
- unsafe working conditions in a kitchen, at a venue or on an event;
- bribery, kickbacks or misconduct in a tender;
- fraud, theft or false records;
- unlawful employment practices;
- sexual harassment, or other harassment or discrimination;
- environmental harm, such as illegal waste disposal;
- deliberate concealment of any of the above.

7. How to raise a concern

Route	How it works
The normal route	Jessica Perrier, our HR contact — jessica@athomecatering.co.uk . You can also speak to her in person.
Your line manager	If you would rather start there, you can. A manager who receives a concern must pass it on and must not try to resolve it quietly.
At an event	Tell the event manager or supervisor. They may receive the concern and must pass it on; they do not decide the outcome themselves.
If the normal route is not right — including where the concern is about Jessica Perrier	Christophe Perrier, or another appropriate senior manager.
A senior alternative	John Walker. A private direct route to John is maintained internally and is not a shared mailbox. It will be made available internally before this policy is brought into effect.
If anyone is in immediate danger, violence is happening or threatened, or a serious incident needs an immediate police response	Call 999.

You can bypass any normal route. If the person you would normally tell may be involved, if you reasonably believe the route is inappropriate, or if there is an urgent safety or safeguarding risk, go to another route instead — you do not need permission, and you do not have to explain why first.

If you believe a crime may have been committed but there is no immediate danger, you may report it to the police using the appropriate non-emergency route, including 101 or online reporting. Nothing in this policy prevents anyone contacting the police, a regulator or any other statutory body.

Facts, dates, locations, the people involved, documents and possible witnesses all help — but proof is not required before you raise a genuine concern. Please do not investigate the matter yourself, confront the people involved, or access records or systems you are not authorised to use. That can put you at risk and can damage the matter you are trying to raise.

A concern raised without a name will be considered where there is enough information to act on. Giving your contact details helps us ask follow-up questions and keep you informed, but the choice is yours. We do not operate a whistleblowing hotline, an online reporting portal, an anonymous reporting system or an external reporting service, and we do not claim to.

8. Raising a concern outside the company

We encourage people to raise concerns internally where that is appropriate, but nothing in this policy requires you to use an internal route before using an external route available to you under the law. Nothing in this policy removes, restricts or narrows any route the law gives you.

- Independent advice. You can always take independent legal advice, and a disclosure made in the course of obtaining it has its own statutory protection. Acas can advise, and Protect — the independent UK whistleblowing charity — offers free advice on whistleblowing. We do not fund or retain either of them; they are independent of us, which is the point.
- Prescribed people and bodies. The law lets workers report certain matters directly to a prescribed person or body — usually the regulator for the subject area — where the statutory conditions are met. Check that the body you choose covers the subject of your concern; the official list is maintained by the government and published at gov.uk.
- Wider disclosures, for example to other third parties, are possible in law only in narrower circumstances and on more demanding conditions. Take advice first.
- Disclosure to the media or on social media is not automatically protected and may fail the statutory conditions. Nothing in this policy makes it protected.

A confidentiality clause cannot validly stop a worker making a protected disclosure. Any such provision is void to that extent, and we will not ask anyone to sign one that purports to do it.

9. Confidentiality and anonymity

- Concerns received with or without a name will be considered where there is enough information to act.
- Confidential means restricted, not absolute. We will restrict your identity and the details to those with a genuine need to know — but the law, someone's safety, or fairness to a person facing an allegation may require disclosure, and absolute confidentiality cannot be promised.
- Where it is reasonably possible, we will tell you before your identity is disclosed, unless the law, safety or the integrity of an investigation prevents it.
- Anonymity may limit what we can look into and what we can tell you afterwards, and technical anonymity cannot be guaranteed.

10. Protection from retaliation and detriment

Nobody should suffer because they spoke up. Retaliation includes, for example:

- dismissal;
- reduced shifts, hours or earnings;
- being left off rotas or excluded from work opportunities;
- bullying, harassment or threats;
- an adverse reference;
- being passed over for training or promotion;
- any other disadvantage connected with having spoken up.

Stated accurately: the law protects workers against detriment for making a protected disclosure, including detriment inflicted by a colleague or an agent, for which the employer can also be liable; and dismissal of an employee for making a protected disclosure is automatically unfair. Protection does not depend on the concern being upheld, and good faith is not a condition of protection — although a tribunal may reduce an award where a protected disclosure was not made in good faith.

Raising a concern does not give anyone immunity for their own separate, proven misconduct: a genuine disciplinary matter unconnected with the disclosure remains a genuine disciplinary matter. Anyone who retaliates against someone for speaking up may face action under the applicable procedure.

11. Fairness to everyone involved

- an allegation is not proof, and nobody is presumed guilty;
- a person affected by a concern gets a reasonable opportunity to respond to material allegations before any internal adverse conclusion, unless an urgent protective step is genuinely needed first;
- a temporary protective step is precautionary, not a finding — no sanction, suspension or dismissal follows automatically from a concern being raised;
- individuals are not named more widely than necessary;
- internal findings are internal. They are not criminal, regulatory or tribunal findings.

12. What happens after you raise a concern

Once this policy is in effect:

- we acknowledge the concern where there is a way to reply, and tell you it is being assessed;
- we check for conflicts of interest before anyone is chosen to look into it, and we record the result of that check;
- a concern about the person who would normally handle it goes to someone else, and that person sees nothing about it;
- we consider immediate safety, safeguarding and evidence-preservation needs first, and we do not wait for the rest of the process to do that;
- we look into the matter proportionately — a small matter does not get a heavy process — and we keep notes that are factual, dated and attributed;
- we treat everyone fairly, including the person the concern is about, who is not assumed to be at fault;
- we keep you proportionately informed where we can contact you, while recognising that some detail about another person is confidential and cannot be shared;
- we take corrective action where a concern is substantiated, and we record what changed;
- we record the closure decision, who made it and on what basis;

- we check afterwards for any sign of retaliation, because it can arise during or after a case.

We do not promise a response deadline. A timetable we could not reliably meet would be worse than none, so the handling arrangements and any timescales are being settled before this policy takes effect, and we would rather say that than publish a target we cannot keep.

13. Records

When this policy is in effect, records about a concern will be kept only where they are necessary, and will be accurate, minimal, restricted and held securely, with access limited to the people who need it for that case. Where a concern involves someone who would normally have access to where such records are kept, separate arrangements will be made so that the person concerned cannot reach them.

Information about an identified or identifiable suspected offender can amount to criminal offence data under data protection law, and information about reporters, witnesses and others is personal data that may be sensitive. Both will be handled with corresponding care. There is no live whistleblowing case register, and the lawful basis, the condition for any criminal-offence information, retention, deletion, privacy information and access controls are being settled in a privacy review before this policy takes effect.

14. Training and communication

Before this policy takes effect it will be communicated to everyone who works with us through a confirmed channel, the reporting routes will be tested, and proportionate guidance will be given to staff and to managers — managers in particular on escalation, on confidentiality and on the no-retaliation rule. No training has been delivered against this policy yet, and none is claimed.

15. Review

This policy is reviewed at least every 12 months once it is in effect, and earlier after a relevant change in the law, our operations, our people, our systems, our suppliers or our risks. A review looks at the concerns received, how they were handled, what changed as a result and whether the routes still work. A low number of concerns does not by itself prove that there is nothing to find. Governance reporting will use aggregate, non-identifying information only.

16. The law we work to

This section states the law as it stood when this copy was prepared on 16 October 2026, checked against the legislation and official guidance. It separates what is in force now from what is not yet operative.

In force now

- The framework is Part IVA of the Employment Rights Act 1996, inserted by the Public Interest Disclosure Act 1998.
- A qualifying disclosure is a disclosure of information which, in the worker's reasonable belief, is made in the public interest and tends to show one of the categories in section 43B — the list in section 4 of this policy.
- A qualifying disclosure becomes a protected disclosure when it is made in one of the ways the Act allows: to the employer or another responsible person, in the course of obtaining legal advice, to a prescribed person or body, or, on more demanding conditions, more widely.
- A disclosure made through a procedure the employer has authorised is treated as a disclosure to the employer.

- Workers have the right not to be subjected to detriment for making a protected disclosure (section 47B). That covers detriment by another worker acting in the course of employment, or by an agent acting with the employer's authority, and the employer is treated as responsible for it. For detriment by another worker, the employer has a defence if it shows that it took all reasonable steps to prevent that conduct.
- Dismissal of an employee because they made a protected disclosure is automatically unfair (section 103A).
- Good faith is not a condition of protection. Where a tribunal finds that a protected disclosure was not made in good faith it may reduce an award by no more than 25 per cent (sections 49(6A) and 123(6A)).
- A contractual confidentiality clause is void in so far as it purports to stop a worker making a protected disclosure (section 43J).
- Since 6 April 2026, sexual harassment has been one of the subjects a qualifying disclosure can be about: section 43B(1)(da), added by section 23 of the Employment Rights Act 2025 and commenced on that date, with sexual harassment defined as unwanted conduct of a sexual nature within section 26(2) of the Equality Act 2010.

Not yet operative

Section 24 of the Employment Rights Act 2025 inserts a new section 202A into the Employment Rights Act 1996, making a confidentiality clause void so far as it purports to prevent a worker making an allegation or disclosure about relevant harassment or discrimination, or about the employer's response to one. Its commencement is partial: the inserting provisions are in force for specified purposes only – 6 January 2026 under S.I. 2026/3 and 6 April 2026 under S.I. 2026/323 – which includes the power to set by regulations the conditions for an excepted agreement. Those regulations had not been made when this copy was prepared, and the Government's published timeline places them in 2027.

We therefore do not present that wider rule as operative. It changes nothing for this policy in practice: section 43J already makes such a clause void so far as it purports to prevent a protected disclosure, and this policy does not authorise the use of such a clause.

The wording of this section must be re-checked on the date this policy is approved, and updated if the position has moved by then.

This section reflects official sources, not legal advice.

Who we are

Legal entity	At Home Catering Limited
Company number	02763948 (registered in England and Wales)
Registered office	Kings House, 9-10 Haymarket, London, England, SW1Y 4BP
Trading and contact address	40 High Street, Cobham, Surrey, KT11 3EB, United Kingdom
Email	parties@athomecatering.co.uk
Telephone	+44 (0)1932 862026
Brands	At Home Catering is our public business name. At Home Events is a customer-facing events brand of At Home Catering Limited. It is not a separate company and never the contracting party.