

1.0 Objective and Purpose

The objective of this procedure is to encourage team members to raise any genuine concerns they might have about certain wrongdoings within the company without fear of reprisal, to provide them with guidance on how to raise those concerns and to enable the company to investigate such concerns and deal with them appropriately.

2.0 Eligibility

This procedure applies to all team members, apprentices, and anyone else who has a contract to carry out work for us personally. Other individuals performing functions in relation to the organisation, such as agency workers and sub-contractors, are also encouraged to use it.

3.0 Scope

Team members should not use this procedure for complaints relating to their own circumstances, such as the way they have been treated at work. In those cases, they should use the Grievance Procedure as appropriate.

This procedure is for making a disclosure of wrongdoing or malpractice where the team member reasonably thinks that disclosure is in the public interest. If you are uncertain whether or not something is within the scope of this policy, seek advice from your line manager.

This procedure does not give contractual rights to individual team members. The company reserves the right to alter any of its terms at any time although we will notify you in writing of any changes.

4.0 Types of wrongdoing addressed by this procedure

If a team member genuinely believes that the company, or any of its team members, has taken, is intending to take or has failed to take action that they reasonably believe could lead or amount to:

- a criminal offence including bribery.
- a failure to comply with any legal obligations.
- a miscarriage of justice.
- danger to the health and safety of any individual.
- damage to the environment.
- the deliberate concealment of information concerning any of the matters listed above

5.0 Procedure

Team members should disclose this information verbally or in writing to their line manager. If a team member makes such a disclosure, they should provide full details and, where possible, supporting evidence.

Any concerns covered by this procedure should be raised with your line manager to allow the company the chance to deal with them. Team members should not bypass this procedure and air concerns externally, other than in exceptional circumstances, for example if they have good reason to believe that evidence would be destroyed. Remember also that social media sites such as YouTube and Facebook are public rather than private spaces, and they are not the appropriate channels for raising concerns.

5.1 Investigating allegations of wrongdoing

If a team member discloses information in accordance with this procedure, wherever reasonably practicable, their identity will be kept confidential.

The allegation will be investigated promptly. During the course of the company's investigation the team members assistance may be required. Anonymous disclosures are discouraged, as they are likely to hinder effective investigation. Its aim is to keep the team member informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent the company giving the team member specific details of the investigation or any disciplinary action taken as a result. Team members should treat information about the investigation as confidential.

The company cannot always guarantee the outcome sought, but it will try to deal with the concern fairly and in an appropriate way. By using this policy team members can help the company to achieve this.

If a team member is not happy with the way in which their concern has been handled, they can raise it with the General Manager.

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The team member will be informed of the outcome of the investigation as soon as practicable and whatever action is considered to be appropriate will be taken.

5.2 Action the company may take

No action will be taken against anyone who raises a genuine concern in accordance with this procedure.

The company may take appropriate action against any person found to be:

- Victimising another person for using this procedure (team members should contact their line manager if they think they have been victimised or raise it formally under the grievance procedure if the matter is not remedied).
- Deterring any person from reporting genuine concerns under this procedure (team members should contact their line manager if they think they have been victimised, or raise it formally under the grievance procedure if the matter is not remedied), or

For team members this action may involve the company taking disciplinary action, which may result in dismissal. The company may also take disciplinary action against a team member who does not act in accordance with this procedure.

5.3 Confidentiality, data protection and record keeping

The company aim to deal with allegations raised under this policy sensitively and with due respect for the privacy of the individuals involved. All team members must treat as confidential any information communicated to them in connection with an allegation made under this Policy.

Conducting investigations and hearings under this policy involves the company processing the personal data of the team members concerned and may also include the processing of personal special category data. The company use this personal data in order to investigate and deal with whistleblowing allegations.

The company legal grounds for doing so are that it is necessary:

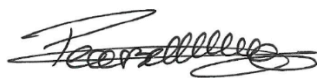
- to comply with their legal obligations and for the performance of the employment contract (i.e. to investigate and deal with allegations of wrongdoing in accordance with the duty of trust and confidence to their team member)
- in their legitimate interest to deal effectively with whistleblowing allegations, whether team members are the subject of them or are otherwise connected to the issues raised.

The company additional legal grounds for processing special category data are that this is necessary: to exercise legal rights/comply with legal obligations in relation to employment; and to establish, exercise or defend legal claims.

Where the company take witness statements from team members with information about the allegations being investigated under this policy, such statements will be treated confidentially and will only be shared with individuals who need to be involved in the investigation and any follow-up action. This will ordinarily be the person/people conducting investigations. In addition, if in the course of investigations under this policy it becomes apparent that misconduct has taken place which requires investigation under our disciplinary policy, witness statements taken under this policy may be used in any subsequent disciplinary procedure and may therefore be shared with the person/people conducting investigations and hearings, as well as the team member whose conduct is the subject of disciplinary proceedings, to enable them to prepare for the hearing and respond to the allegations against them.

The company will ordinarily keep records of allegations raised under this procedure in compliance with our retention policy from the date of completion of investigations and any follow-up action. However, there may also be circumstances in which it is appropriate for them to keep particular records under this policy for a longer period. In such circumstances, the company will decide how long records should be retained in accordance with the criteria set out in their retention policy.

Signed:



Pearse McKeefry
(Managing Director)

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