

## WHISTLEBLOWING

### 1. Introduction

The Company recognises that whistle blowing in the workplace, in any form, is acceptable under the Public Interest Disclosure Act 1998. Wales Environmental Ltd aims to provide a working environment which is free from malpractice.

Whistle blowing is when an employee or worker provides information, usually about dishonest or illegal practices to the employer or the regulator, which has come to their attention through work.

Whistle blowing occurs when an employee or worker raises a concern about danger or illegality that affects others, for example members of the public.

#### Examples of Whistle Blowing

The following outlines examples of the type of behaviour which the Company would consider as whistle blowing matters, for which the person(s) responsible may face disciplinary action and in serious cases, it may be considered gross misconduct and warrant a summary dismissal if the allegations are proven to be substantiated. It is not an exhaustive list.

- Criminal offences
- Exposing fraud
- Mis-selling of pensions or financial products
- Health and safety issues concerning transport that puts the safety or workers at risk
- Health and safety issues concerning the workplace that puts the safety of workers or visitors at risk
- Failure to investigate allegations of sexual assault by one employee against another
- Failure to comply with legal obligations, breaches of legislation, e.g. the data protection act
- Payments in exchange for awarding contracts
- Risks to the environment

### 2. Responsibilities

All Directors and Managers are expected to have a full understanding of this policy and its procedures. Any Manager who needs further clarification should consult with the HR department.

Managers have a duty to be vigilant and should encourage employees to make it known if they come across malpractice in the workplace.

If the allegation is against the employee's line manager then the complaint should be made to the HR department.

### 3. Training and Education

This policy is displayed on the notice board at each depot, working location or offices of the Company.

All Managers receive a copy of this policy and are trained in the awareness of whistle blowing at work.

The Whistle Blowing Policy is included in the induction pack of all new employees and all employees will be advised that no repercussions will occur with the individual for raising a concern.

### 4. Complaints Procedure

All complaints will be treated seriously and with appropriate confidentiality.

Employees, who believe they have witnessed any malpractice within the Company, are encouraged to discuss the matter with their supervisor or manager. If an employee feels unable to discuss the matter

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with their immediate supervisor or manager, they should make contact with any supervisor or manager with whom they feel comfortable. They can also make contact with the Company's Human Resources Department.

1. In discussing any possible cases of whistle blowing with an employee, Managers will adopt the following procedure:
2. The aim of the procedure is to resolve the problem as quickly as possible, and wherever practicable, as near as possible to the hierarchical level at which the problem arises.
3. Any initial discussions will be in the strictest confidence, to allow the employee to talk the problem through.
4. If appropriate a full investigation will be carried out and assessment made of the concern.
5. The employee will be informed of the progress and a written copy will be kept on their personnel file.
6. Managers or supervisors will ensure an action plan is compiled and the appropriate remedy is taken where necessary.
7. In the event that the approach does not satisfy the employee, a formal complaint using the company's grievance procedure, may be made.
8. Where a formal complaint is registered in writing, the grievance procedure will be invoked, and a full investigation instigated.
9. An employee who is not satisfied with the outcome of the formal complaint may ask for the matter to be reviewed by another Manager.
10. At any stage of discussions a colleague or a representative may accompany an employee.
11. The above does not affect the Company's right to deal with any forms of whistle blowing by way of the disciplinary procedure regardless of the complainant's request.

### 5. Disciplinary Measures

Where formal investigations have been conducted and where it has been concluded that some form of malpractice has taken place, those responsible for such acts will be subject to disciplinary procedures. Acts of malpractice may be classified as gross misconduct and may lead to summary dismissal.

If an employee makes and continues to make malicious allegations which have not been substantiated then the Company make look to invoke the disciplinary procedure against them.

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**6. Revision**

Name of Policy:	Whistleblowing Policy
Purpose of the Policy:	Sets out the Whistleblowing Policy
Approved by:	Barry Murphy – 
Responsible for its Updating:	Kevin Stewart
Procedure Applies to:	All employees
Date Original Initiated:	January 2022
Date of Approval:	5 <sup>th</sup> January 2022
Proposed date of Review:	4 <sup>th</sup> January 2023

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