



Whistleblowing Policy 2023-24

Introduction

Sunter Limited are committed to the highest possible standards of openness, probity and accountability and expect the high standards from all involved in the business.

This policy aims to:

- Provide the avenue for individuals to raise concerns and be informed of action taken.
- Give assistance to individuals who wish to make a public disclosure.
- Inform individuals of escalation routes if required.
- Reassure individuals that any disclosure made will not end in any penalty against the individual, providing they are not knowingly making false allegations.

Legislation

The Public Disclosure Act 1998 provides protection for individuals who raise legitimate concerns about specific matters. These are called qualifying disclosures. A qualifying disclosure is one made in the public interest by an employee who has reasonable belief that any of the following has taken, will take place:

- A criminal offence
- A miscarriage of justice
- An act of creating risk to health & safety
- An act causing damage to the environment
- A breach of any other legislation
- Concealment of any of the above.

Further information on the full specification of the Public Disclosure Act can be found at:

<https://www.gov.uk/government/publications/the-public-interest-disclosure-act>

Principals

All employees should be aware of the importance of preventing or eliminating wrongdoing at work. Any matter reported under this policy will be dealt with speedily, appropriately, fairly, professionally and confidentially. No employee will be victimized or suffer any detriment for raising concerns.

If misconduct is discovered as a result of any investigation, disciplinary action will be taken in addition to any external measures.

Roles & Responsibilities

Employees:

To understand all company policies and procedures and report any issue that they are aware of that is against company policies, health & safety protocol and/or procedures. Employees also have a duty of care to report any victimisation, bullying and/or harassment of individuals and/or groups of people or other wrongdoing carried out by employees and/or contractors.

Site Managers:

To investigate any report from employees and involve the H&S Manager and Directors where required. A formal report must be devised and passed to the Directors for review.

H&S Manager:

Work with the Site Managers and employees to ensure any issues received are dealt with confidentially and through to completion.

Directors: To evaluate investigation reports and deal with any disciplinary action required.

Monitoring & Review

This policy will be reviewed annually as part of the company Policies Review by the H&S Manager or in line with the business requirements. He will liaise with the Directors and implement any additions and/or omissions required.

How to Raise a Concern

In the first instance, and unless the employee believes that the Site Manager may be involved in the alleged wrongdoing, or if for any other reason the employee does not wish to approach the Site Manager, the employee should raise the concerns with the Site Manager.

In this instance, the employee should approach the H&S Manager or Directors and raise the concern directly.



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Anonymity

Individuals are strongly encouraged to put their name to any concern raised. Concerns made anonymously will be considered to a lesser extent as there may be no evidence to back up the allegation and any investigation will be hampered.

Anonymous disclosures are preferred to no disclosure at all as it makes the Directors aware of any potential issue that may have not been evident previously.

Taking Advice

Sunter Limited has in place an external Employee Assistance Programme. This has 24/7 access for employees to raise any issues, including advise on potential wrongdoing.

This is a confidential programme and can be accessed as follows:

- 24Hour Freephone 0800 032 7097
- www.healthassuredeap.com

Employees are encouraged to, if they are unsure of raising any concerns to speak to a n advisor confidentially before deciding on what action to take.

Malicious, false or untrue allegations

Any employee that has been found to have made deliberate false allegations will be disciplined and may face dismissal due to gross misconduct.

The use of this policy is a serious matter and should only be used if the individual is sure of the allegation.

The following will be regarded as a breach of the code of conduct and may result in disciplinary action being taken against individuals concerned:

- Making false and/or malicious allegations
- Knowingly disclosing false information
- Deliberately deterring individuals from raising a concern
- Intentionally obstructing or trying to obstruct an investigation
- Victimising or harassing someone because they are preparing to raise or have raised a qualified disclosure under this procedure.
- Report any instruction to cover up a wrongdoing, even if by management

What Happens Next?

Once a concern has been reported, the individual receiving the report will consider the concern and notify the relevant Managers/Directors.

An investigation will be carried out, this may be informal chats to the concerned parties or the investigation may take a more formal route and involve external organisations. This will be dependant on the nature of the alleged concern.

The Directors decision on any investigation will be final and may involve disciplinary action against perpetrators.

Support & Protection

Sunter Limited realises that any decision to disclose a matter is a difficult one. Full support and protection will be given to any employee making such a disclosure. Sunter Limited will not tolerate ANY harassment or victimisation and will take all internal and external action to protect employees when they raise a concern.

Policy Date: March 2023

Policy Written by:

Name: John Walker

Signature:

Position: Health, Safety & Environment Manager

Review Date: March 2024

Policy Reviewed by:

Name: Kevin Stubbs

Signature:

Position: Company Director