



WHISTLE BLOWING POLICY

Whistleblowing is the term used when a worker passes on information concerning wrongdoing. In this policy, we call that “making a disclosure” or “blowing the whistle”. The wrongdoing will typically (although not necessarily) be something they have witnessed at work.

To be covered by whistleblowing law, a worker who makes a disclosure must reasonably believe two things. The first is that they are acting in the public interest. This means that personal grievances and complaints are not usually covered by whistleblowing law.

The second thing that a worker must reasonably believe is that the disclosure tends to show past, present or likely future wrongdoing falling into one or more of the following categories:

- criminal offences (this may include, for example, fraud, tax evasion, corruption, bribery or blackmail)
- failure to comply with a legal obligation or regulatory requirement set out in law
- miscarriages of justice
- financial mismanagement
- endangering of someone’s health and safety
- damage to the environment
- breach of our internal policies and procedures
- conduct likely to damage our reputation or financial wellbeing
- unauthorised disclosure of confidential information
- deliberate concealment of any of the above matters

The company has introduced this Whistleblowing Policy to ensure all employees are able to operate safely, secure in the knowledge that they can stop work if they believe a task or situation will endanger themselves or others.

Reporting a Concern

Whistleblowing law is located in the Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998). It provides the right for a worker to take a case to an employment tribunal if they have been victimised at work or they have lost their job because they have ‘blown the whistle’.

Any employee who stops work in good faith due to unsafe conditions or reports wrongdoing is performing a valuable service to the company and will be protected from any form of penalty for having done so. Whistleblowers are encouraged to report any concerns and must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern

Any employee or person working on behalf of the company may make a disclosure (i.e. report a serious concern as above) to their line manager or a member of Senior Management. This may be done anonymously if preferred via letter or phone call, although be aware the company will not be able to provide feedback or information on actions taken if the report is anonymous. Confidentiality can be requested when making a disclosure.

You do not need to provide evidence when making a disclosure.

The company is committed to treating all disclosures consistently and fairly and to taking all reasonable steps to maintain the confidentiality of the whistle-blower where it is requested (unless required by law to break that confidentiality).

The person receiving the disclosure must report to senior management if possible and must take all reasonable steps to investigate the report within a reasonable timescale. The event and the remedial action are to be recorded by the person in charge or the member of senior management involved.



If you are unsure about talking to management, further information and advice to those thinking of blowing the whistle can be found on the Government website and through ACAS.

See also our Refusal to Work Policy POL006.

Victimisation of a whistle-blower is not acceptable. Any instances of victimisation will be taken seriously and managed appropriately.

This Policy will be reviewed following any changes to working practices or applicable legislation, or at least annually.

Signed: 
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Date: 01/07/2026
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