



## WHISTLE BLOWING POLICY

### 1.0 ABOUT THIS POLICY

1.1 Anglian Excavations Limited is committed to conducting its business with honesty and integrity, and we expect all employees and workers to maintain high standards in accordance with our values. However, all organisations' face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential to prevent such situations occurring and to address them when they do occur.

For the interest of this policy the words “we” and “our” means Anglian Excavations Ltd.

1.2 The **PUBLIC INTEREST DISCLOSURE ACT 1998** aims to gain a balance between the public interest and the interests of employers. It sets out a framework for public interest whistleblowing, which protects workers from reprisal because they have raised a concern about malpractice. Though the Act is part of employment legislation, its scope is wide and no qualifying periods or age limits restrict the application of its protection.

This policy takes account of the Whistle-blowing Arrangements Code of Practice issued by the British Standards Institute and Public Concern at Work and aims to:

- (a) To encourage employees and workers to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- (b) To provide employees and workers with guidance as to how to raise those concerns.
- (c) To reassure employees and workers that they can raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

1.3 This policy covers all employees and workers including consultants, contractors, casual workers and agency workers.

### 2.0 PERSONNEL RESPONSIBLE FOR THE POLICY

2.1 The Senior Management Team of Anglian Excavations Ltd has overall responsibility for this policy and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

2.2 The Whistle-blowing Officer has responsibility for this policy and must ensure that all managers and other employees who may deal with concerns or investigations under this policy receive regular and appropriate training.

2.3 The Whistle-blowing Officer, in conjunction with the Senior Team, should review this policy from a legal and operational perspective at least once a year.

2.4 All employees and workers are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Whistle-blowing Officer.

### **3.0 WHAT IS WHISTLE-BLOWING?**

- 3.1 Whistle-blowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:
- (a) criminal activity;
  - (b) failure to comply with any legal obligations;
  - (c) miscarriages of justice;
  - (d) danger to health and safety;
  - (e) damage to the environment;
  - (f) bribery under our Anti-Corruption Policy and Procedures;
  - (g) financial fraud; (h) negligence;
  - (i) material breach of our internal policies and procedures
  - (j) material conduct likely to damage our reputation;
  - (k) unauthorized disclosure of confidential information;
  - (l) the deliberate concealment of any of the above matters; and
  - (m) bullying, harassment and discrimination.
- 3.2 A whistle-blower is a person who raises a genuine concern relating to any of the above. If an employee or worker has any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a Whistle-blowing concern) they should report it under this policy.
- 3.3 This policy should not be used for complaints relating to an employee's own personal circumstances, such as the way they have been treated at work. In those cases, an employee should use the company's' grievance procedure.
- 3.4 If an employee or worker is uncertain whether something is within the scope of this policy, they should seek advice from the Whistle-blowing Officer, whose contact details are on page 4.

### **4.0 RAISING A WHISTLE-BLOWING CONCERN**

- 4.1 We hope that in many cases an employee or worker will be able to raise any concerns with their immediate manager. They may tell them in person or put the matter in writing if preferred. The manager may be able to agree a way of resolving the concern quickly and effectively. In all cases the manager should refer the matter to the Whistle-blowing Officer so that the matter can be reported to the Senior Team.
- 4.2 However, if an employee worker feels that their manager has not addressed their concern, or they prefer not to raise it with them for any reason, they should contact the Whistle-blowing Officer. Contact details are set out on page 4.
- 4.3 The Whistle-blowing Officer will arrange a meeting or call with the employee or worker as soon as possible to discuss their concern.
- 4.4 The Whistle-blowing Officer will take down a written summary of the concern and provide them with a copy after the meeting or call. The Whistle-blowing Officer will also aim to give an indication of how we propose to deal with the matter.

## 5.0 **CONFIDENTIALITY**

- 5.1 We hope that an employee or worker will feel able to voice Whistle-blowing concerns openly under this policy. However, if they wish to raise a concern confidentially, we will make every effort to keep their identity secret. If it is necessary for anyone investigating the concern to know an employee's identity, this will be discussed with them before their name is disclosed.
- 5.2 We do not encourage employees or workers to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from that person. It is also more difficult to establish whether any allegations are credible. Whistle-blowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistle-blowing Officer and appropriate measures can then be taken to preserve confidentiality. If an employee or worker is in any doubt, please use the confidential and independent helpline offered by Safecall, details of which are set out in page 4.

## 6.0 **INVESTIGATION AND OUTCOME**

- 6.1 Once an employee or worker has raised a concern, we will carry out an initial assessment to determine the scope of any investigation and will inform the employee or worker of the outcome. They may be asked to attend additional meetings in order to provide further information.
- In some cases we may appoint an investigator or team of investigators including employees with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimize the risk of future wrongdoing.
- 6.2 We will aim to keep the employee/worker informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving the employee/worker specific details of the investigation or any disciplinary action taken as a result. The employee/worker should treat any information about the investigation as confidential.
- 6.3 If we conclude that a whistle-blower has made false allegations maliciously or with a view to personal gain, the whistle-blower, if an employee will be subject to disciplinary action in accordance with employment policies.

## 7.0 **IF THE EMPLOYEE IS NOT SATISFIED WITH THE OUTCOME**

- 7.1 While we cannot always guarantee the outcome the employee/worker is seeking, we will try to deal with concerns fairly and in an appropriate way. By using this policy employees can help us to achieve this.
- 7.2 If an employee/worker is not happy with the way in which their concern has been handled, they can raise it with the Whistle-blowing Officer. Alternatively, they may contact the Chair of the Senior Team. Contact details are set out on page 4.

## 8.0 **EXTERNAL DISCLOSURES**

- 8.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases an employee or worker should not find it necessary to alert anyone externally.
- 8.2 The law recognises that in some circumstances it may be appropriate for an employee or worker to report their concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media. We encourage employees and workers to raise matters internally before reporting a concern to anyone external to the business.

8.3 Whistle-blowing concerns usually relate to the conduct of the business and in certain circumstances employees, but they may sometimes relate to the actions of third party workers, such as a customer, supplier or service provider. In some circumstances the law will protect an employee if they raise the matter with the third party directly. However, we encourage particularly our employees to report such concerns internally first. Employees should contact their immediate manager or the Whistle-blowing Officer for guidance.

## 9.0 PROTECTION AND SUPPORT FOR WHISTLE-BLOWERS

9.1 It is understandable that whistle-blowers are sometimes worried about possible repercussions. We encourage openness and will support employees and workers who raise genuine concerns under this policy, even if they turn out to be mistaken.

9.2 Whistle-blowers 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. If employees or workers believe that they have suffered any such treatment, they should inform the Whistle-blowing Officer immediately. If the matter is not remedied, they should raise it formally using the grievance procedure.

9.3 Managers, employees and workers must not threaten or retaliate against whistle-blowers in any way. If employees are involved in such conduct, they may be subject to disciplinary action.

## 10.0 CONTACTS

Whistle Blowing Officer	Sandra Watts
Chair or Senior Team	Chris Lee
Safecall (Independent Confident Reporting Line)	Helpline: 0800 915 1571 International Freephone numbers <a href="http://www.safecall.co.uk/report">www.safecall.co.uk/report</a>

Safecall provide an independent confidential reporting line where you can raise your concerns and be assured they will be fully addressed. Calls are handled by skilled staff and will be treated in complete confidence. A report of the call will be sent to the company and Safecall will not disclose your name to Anglian Excavations if you wish to remain anonymous.

Employees can contact Safecall at any time on the Freephone numbers where you can speak to someone in your preferred language.

The Safecall line is available 24/7 365 days. Alternatively, Safecall can be contacted via e-mail or via the web [www.safecall.co.uk/report](http://www.safecall.co.uk/report)

Signed: \_\_\_\_\_

Chris Lee

**Position:** Chief Executive Officer

**Date:** January 2021