

WHISTLEBLOWING POLICY

Employees are often the first people who realise that there may be something seriously wrong within an organisation but may be reluctant to express their concerns. This could be for several reasons: because speaking up might be regarded as disloyal by employees; fear of victimisation; doubts about reporting what might only be a suspicion, or because it might seem easier to ignore it and not get involved.

Cheetham Hill Construction Ltd is committed to high standards of fairness, honesty, openness, and accountability. As part of this commitment, employees or others with serious concerns about wrongdoing are encouraged to do the right thing and come forward and express those concerns.

The Company Directors have a responsibility for protecting workers from reprisals when reporting health and safety incidents, hazards, risks and opportunities or if they remove themselves from work situations that they consider present an imminent and serious danger to their life or health.

The Company has a confidential helpline (03333 202 351) in place for its employees, which can be used to raise a concern. Posters displaying the number can also be found on notice boards at head office and on all Company sites.

Aims

- Provide confidential avenues for you to raise concerns of wrongdoing and receive feedback on any action taken.
- Allow you to take the matter further if you are dissatisfied with the initial response.
- Reassure you that you will be protected from reprisals or victimisation for whistleblowing in good faith, provided that you have followed the recognised procedure.
- Recognise that whilst such concerns will be voiced in good faith, the fundamental principle of natural justice will operate in response of any individual or collective group against whom a concern has been expressed. This will not, however, prevent the Company from suspending such individuals from their employment if it is considered appropriate to do so. In such circumstances suspension will not be regarded as a punitive measure.

Examples of wrongdoing

- Criminal activity by an individual or a collective body
- A breach of legal obligation, including negligence, breach of contract, or breach of administration law
- Corrupt or fraudulent behaviour
- A breach of Company procedures
- A risk to health and safety or the environment

Procedure

- Any concerned employee should come forward before matters develop into something more serious.
- As a first step you should raise concerns with your Line Manager or a Company Director. Any such contact will be treated in strict confidence.

- All our employees also have access to a confidential helpline should they prefer to use this when raising a concern.
- Setting out the background to your concern in writing and providing documents in support would be helpful. A contemporaneous note will be taken when you express your concern and this note will be used as evidence.
- Although you are not expected to prove the truth of an allegation, you will need to demonstrate to a Manager/Director concerned that there are sufficient grounds for your concern.

Company action

- Any action taken by Cheetham Hill Construction Ltd will depend on the nature and scale of the alleged wrongdoing and the evidence that is available. The Company is committed to dealing with any problem reported promptly and conscientiously. The Company will always pursue fraud and serious abuse as vigorously as possible or, if necessary, through the courts. Where appropriate, serious matters will be reported to the Police.
- Any Company investigation will be conducted impartially, objectively, in confidence and in a timely manner and the results acted upon appropriately. The Company has to be fair not only to the employee who makes the report but also to any others involved. If someone is being accused of misconduct, their side of the story will be investigated as well.

Protecting our employees

- The Company will do everything legally possible to respect the employee's confidentiality and protect their identity, if this has been requested. It must be noted that the Company can only ensure this for internal process. Where serious matters are reported to an official authority it may not be possible to protect identity. Concerned employees will be supported and protected from reprisals or victimisation as far as possible. If an employee comes forward with a concern, they can be confident that this will not affect their career prospects. This applies equally if an employee comes forward in good faith with a concern that turns out later not to be justified.
- Employees within the UK are also protected under the Public Interest Disclosure Act. This Act provides legal protection to those who speak up and who honestly and reasonably believe that the information they disclose or the allegations they make are substantially true. The Company extends the protection provided in this Act to employees at any Company location.
- Any attempt to discourage anyone from coming forward to express a genuine concern will be treated as a disciplinary offence. In the same way, anyone who criticises or victimises the employee after a concern has been expressed may be subject to disciplinary action.
- Confidential, false or misleading information should not be disclosed outside the Company. Should you be considering taking a concern outside of the Company, you should be aware of your duty of confidentiality and that you are to comply with the Public Interest Disclosure Act.

Signed: 

Date: ...05/07/2023...

Name: Howard Chamberlain – Managing Director

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