

Pektron Group Ltd–Whistleblowing Policy & Procedure

1. INTRODUCTION

At Pektron Group Ltd we take a responsible approach to business, we work hard to ensure that our business practices meet with legal requirements, and we provide a safe working environment for all our staff. We take any allegations of wrongdoing very seriously and encourage staff to speak out if they have an issue. It is important to distinguish between issues and complaints which are managed through our disciplinary and H&S policies and procedures and 'whistleblowing' which covers more serious wrongdoing which may lead to injury, financial loss and damage to the business' reputation.

2. POLICY OBJECTIVES / PURPOSE

The purpose of this policy is to define specifically what we mean by whistleblowing and how these issues differ from grievance issues. It also explains the process for any worker who feels they need to let a person in higher authority know about something they have seen or heard that they think they should 'blow the whistle' about. This policy will be reviewed annually to ensure compliance with UK law and best practice.

3. WHO THIS POLICY APPLIES TO

Although principally aimed at employees and workers, our Whistleblowing Policy and procedure can also be used by suppliers, business partners and others, to report any concerns about our business practices or conduct.

4. WHAT IS WHISTLEBLOWING?

Whistleblowing legislation protects individuals from dismissal or victimisation, should they disclose serious wrongdoing by colleagues or by their employer. This means that anyone who blows the whistle in good faith will not be subjected to any detrimental treatment for doing so. Any reports of such detrimental treatment will be taken extremely seriously. Providing you are raising a genuine concern, it does not matter if you are mistaken. We do not extend this assurance to someone who maliciously raises a matter they know is untrue.

If you raise a genuine concern under this policy, you will not be at risk of losing your job or suffering any form of reprisal as a result.

Examples of whistleblowing may include alleged wrongful conduct by the employer, a fellow employee, a client or any third party working with the business and could include:

- Practices that may put people's health and safety in danger
- Practices within the business that could cause significant damage to the environment
- Criminal offences
- Breaches of legislation by the company
- Sexual harassment
- Or covering up any of the above

5. WHAT IS THE DIFFERENCE BETWEEN A COMPLAINT THAT COULD BE CLASSED AS A WHISTLEBLOWING AND ONE THAT MAY LEAD TO A COMPLAINT OR GRIEVANCE BEING RAISED?

Issues which could have a wider impact on the public interest are likely to be considered whistleblowing. Issues that are related to 'normal business' would be dealt with either through informal discussions or, failing that, by raising a grievance. The examples below demonstrate some of the differences between grievances and issues where individuals would be expected to blow the whistle:

Grievance issues	Whistleblowing issues
An individual complains about the type of work they are asked to do. They may, for instance, believe that the work does not form part of their role.	An individual discloses that they have been asked to carry out tasks which they genuinely believe to be illegal. E.g. falsifying tax returns.
An employee complains that he or she has received insufficient health and safety training.	An employee discloses that their team has been asked to take short cuts to meet production targets, which endanger safety.
An individual complains about the hours he or she is expected to work.	A disclosure is made stating that the requirements imposed by the business on a group of staff breaches working time regulations.
An individual is concerned about the amount of paper used in their department, and makes this complaint to their manager.	An individual discloses that the way a business disposes of its contaminated waste breaches environmental health laws.
An individual feels they are being bullied in the workplace.	An individual is aware that persistent bullying is taking place and, although it has been reported, it consistently fails to be addressed.
An individual wants to make a complaint because they were unsuccessful when applying for a new role.	An individual is aware of recruitment and selection practices taking place which directly disadvantage disabled people applying for roles in the organisation, breaching the Equality Act.

You should only follow the whistleblowing procedure if you genuinely believe that the disclosure you are making is in the public interest, or the interests of the wider business. Individual complaints should be handled through the grievance procedure.

6. WHAT SHOULD I DO IF I NEED TO BLOW THE WHISTLE?

In the first instance speak to your Line Manager. We hope you will raise your concern openly; however, we recognise that there may be circumstances when you would prefer to speak to someone confidentially first. This means that the person you speak to will take steps to protect your identity. If this is the case, please say so at the outset.

If you ask them not to disclose your identity, they will not do so without your consent unless we are required to do so by law [i.e. allegations of terrorism or money laundering etc].

You should also understand that there may be times when we are unable to resolve a concern without revealing your identity, for example, where your personal evidence is essential. In such cases, we will discuss with you whether and how the matter can best proceed.

If you feel unable to approach your Line Manager about the issue then you may contact one of the following people:

Michelle Sillett, Directors PA: msillett@pektron.co.uk

Jane Keighron: HR Manager: jkeighron@pektron.co.uk

Clive Davey: H&S Co ordinator: cdavey@pektron.co.uk

You can also raise concerns anonymously by writing to us. These complaints will be taken seriously but remember that if you do not tell us who you are, it will be much more difficult for us to look into the matter. We may not be able to protect your position or to give you feedback.

Accordingly, you should not assume we can provide the assurances we offer in the same way if you report a concern anonymously.

If you are unsure about raising a concern, you can get independent advice from Protect, the UK's whistleblowing charity (www.protect-advice.org.uk)

Remember that you do not need to provide detailed evidence when raising a concern. However, we do ask that you explain as fully as you can the information or circumstances that gave rise to your concern. If you have any personal interest in the matter, we do ask that you tell us at the outset. When you raise the concern, it will be helpful for you to say how you think the matter might best be resolved.

How we will handle the matter:

1. We will acknowledge receipt of your concern within 5 working days (unless the concern has been raised anonymously)
2. We will assess it and consider what action may be appropriate. This may involve an informal review, an internal inquiry or a more formal investigation. If we think your concern falls more appropriately within our grievance, bullying and harassment or other relevant procedure, we will let you know and explain why. (unless the concern has been raised anonymously)
3. We will tell you who will be handling the matter, how you can contact them and what further assistance we may need from you. (unless the concern has been raised anonymously)

Whenever possible, we will give you feedback on the outcome of any investigation. Note, however, that we may not be able to tell you the precise actions we have taken where this would infringe a duty of confidence we owe to another person.

While we cannot guarantee that we will respond to all matters in the way that you might wish, we will strive to handle the matter fairly and properly.

If these channels have been followed and your concerns are unresolved or if you feel that the matter is so serious that you cannot discuss it with your line manager or the people listed in above, contact any of the board of Directors.

Victimisation: We are grateful to staff who come forward with information, and we will not tolerate any attempt to silence or victimise people for speaking up. Any instances of whistleblower victimisation will be treated as a disciplinary matter.

Examples of victimisation could include bullying, disciplinary action or any attempt to identify a whistleblower.

If you experience reprisal, harassment or victimisation after raising a concern, alert the person you raised your whistleblowing concern with.

We will listen to you and deal with the matter promptly. Appropriate disciplinary action will be taken, and support will be offered.

Data protection: We will keep a confidential record of your concern, this will be held in accordance with relevant data protection legislation.