

Stainless UK Limited
Newhall Road Works · Sheffield · S9 2QL

Whistleblowing Policy

Stainless UK Ltd are committed to carrying out business in a safe, honest and ethical way. Part of this is creating an open and supportive working environment where employees feel able to speak up about any suspected wrongdoing. This Policy details our process for dealing with whistleblowing.

What is Whistleblowing?

A Whistleblower is generally a term used for a person who works in or for an organisation and raises an honest and reasonable concern about a possible fraud, crime, danger or other serious risk that could threaten colleagues, service users, customers, members of the public or the success and reputation of Stainless UK Ltd.

This policy does not replace our existing grievance and disciplinary policies which should be used by employees who have a personal grievance or are unhappy with the way they are being treated.

Protection and Confidentiality

Whistleblowing law is contained in the Public Interest Disclosure Act 1998 (PIDA – amended by the Enterprise and Regulatory Reform Act 2013).

Stainless UK will not tolerate any harassment or victimisation (including informal pressure) and we will take action to protect you when you raise a concern believed to be in the public interest. We will take any disciplinary or corrective action should anyone attempt to victimise the whistleblower or prevent concerns being raised.

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You may feel that the only way you can raise your concerns is if we protect your identity. We will respect your confidentiality as far as we possibly can but there are times when we cannot guarantee this, for example, where a criminal offence is involved

If we proceed to a formal investigation we may require you to give evidence along with other employees and witnesses; we are, in some circumstances, able to do this without disclosing the identity of the whistleblower. A statement from you may also be required as part of criminal proceedings or Employment Tribunal – this depends on the nature of the concern.

We will attempt to ensure the whistleblower's identity is not disclosed to third parties without a court order. If the information you provide includes personal information about another person, then that person may be entitled to access it under subject access provisions of the Data Protection

Act. If releasing that information could reveal details about the whistleblower, we will always ask for your consent prior to releasing the information.

If your whistleblowing disclosure results in an internal investigation and you provide a witness statement under that process, your statement may be used for disciplinary purposes. This means your statement may be given to the subject as part of a disciplinary hearing. An employee subject to the disciplinary process can ask to see personal information held about them at any time under the subject access provisions of the Data Protection Act – this may include information within your statement. If it is possible to provide access to personal information within your statement without revealing any information about you, we will do so. If this is not possible, we will always seek your consent before releasing any information.

What should be reported

Issues such as the following should be reported using the whistleblowing procedure:

- any bribery, fraud or other criminal offence
- sexual, physical or verbal abuse of our clients, employees or public
- a miscarriage of justice
- a risk to health and safety
- a risk or actual damage to the environment
- a breach of any other legal or professional obligation

Anonymous or Untrue Allegations

Anonymous reporting of concerns are not encouraged as they are more difficult to investigate and are generally less powerful. We would like you to put your name to the allegations whenever possible and remind you of the protection we can provide if we know who you are. Anonymous whistleblowing referrals will be considered at the discretion of the persons handling a concern.

If an allegation is made in good faith and reasonably believed it to be true, but it is not confirmed by the investigation, Stainless UK will recognise your concern and you have nothing to fear. If however, you make an allegation frivolously, maliciously or for personal gain, appropriate action that could include disciplinary action, may be taken.

How to Raise a Concern

Stainless UK encourage initially for concerns to be raised your internally. This allows the company the opportunity to right the wrong and give an explanation for the behaviour or activity. We advise employees to report any allegation to their line manager. We do however recognise that any first actions will depend upon the seriousness and sensitivity of the issues and who you believe to be involved. We advise that you make it clear that you are raising your concerns under the company's whistleblowing arrangements

Concerns are better submitted in writing. This gives opportunity to provide as much information as possible in terms of background and history of your concern, giving names, copies of any documents, dates and places (where possible). We would like you to explain why you are concerned about the situation – we do not expect you to prove the truth of an allegation but you will need to show that there are sufficient grounds for your concern.

How We Will Respond

Our response will depend on the nature of the concern raised and may be:

- advice only
- resolved by agreed action without the need for investigation
- investigated internally
- referred to the Police

We may carry out initial enquiries in order to protect individuals or employees and those accused of wrongdoing. We will use the results of these enquiries to decide whether an investigation is needed and if so, what form it should take. If urgent action is required this will be taken before we start any investigation.

We will acknowledge your whistleblowing disclosure within 5 working days. In the next 10 working days we will write and explain how we propose to deal with the matter.

The amount of contact between you and the person considering your whistleblowing disclosure will depend on the nature of the concerns raised. For example, if further investigation is required, the investigator may need to seek additional information from you.

If a meeting is necessary, this can be held off site if preferred. Employees you will have a right to be accompanied by a work colleague (not involved in the area where the concern exists).

Stainless UK will help with any difficulties experienced as a result of raising a concern – we will, for example, provide advice if you are required to give evidence for criminal or disciplinary proceedings. Sometimes whistleblowers have counter-allegations made against them. Stainless UK has a duty to investigate any concerns that it receives and that will apply in these circumstances. However this will not detract from the principles, as set out in this policy, which govern how the company will respond to whistleblowers. The over-riding objective will be to establish the truth.

Records will be retained of all work carried out and actions taken to address the concerns raised by the whistleblower, including the investigator's case file, where relevant. All files will be held securely and confidentially.

At the end of the investigation we will provide feedback to the whistleblower (if known) on actions taken and limited detail on the outcome of investigations. Feedback will be subject to legal constraints but we do recognise the importance of providing assurances that the matter has been dealt with properly.

Signed



T Wells
Managing Director

Date: 4th January 2021