

Whistleblowing Policy

1 Statement of Policy

This Policy is founded on the principle that Business Waste and its employees / sub-contractors should carry out their business and personal conduct in an ethical manner. Under this Policy, employees / sub-contractors are encouraged to make a report if they have significant concern about any aspect of service provision, or the conduct of the Business Waste directors, associates, employees and sub-contractors (or other parties acting on behalf of the organisation) which may:

- Be unlawful
- Breach the organisation's policies
- Breach established standards of practice
- Represent a failure to comply with a legal obligation
- Be a miscarriage of justice
- Endanger an individual's health and safety
- Cause damage to the environment

Deliberate concealment of information relating to any of the above can and should be reported under this Policy.

The Policy is intended to provide avenues for colleagues to raise concerns, receive feedback on the action taken and gain reassurance that they will be protected from possible reprisals or victimisation. It also allows colleagues to take the matter further if they are dissatisfied with the organisation's response on the concerns expressed.

1.1 Safeguards

Business Waste recognises that a decision to "blow the whistle" can be a difficult one to make. This is likely to stem from fear of reprisal from the individual implicated, or from the organisation as a whole. Business Waste will not tolerate any victimisation and will take appropriate action to protect any person who raises a concern in good faith - including any necessary disciplinary action. If an employee / sub-contractor has a concern, they can seek information and guidance with anonymity.

Wherever possible, the organisation will protect the identity of any colleague who raises a concern and who does not want his / her name disclosed. However, this may not always be possible, as any investigation process may in itself reveal the source of information and a statement by the whistleblower may be a necessary part of the evidence.

Business Waste will protect individuals and the organisation from false, malicious or vexatious expressions of concern. Disciplinary action will be taken against any colleague who is discovered to have made allegations falsely and maliciously.

Any concern that is sincerely felt and expressed may, on investigation, prove to be unfounded. The organisation will try and ensure that the negative impact of either a false or unfounded allegation on any "accused" person is minimised but acknowledges that it will not be possible to prevent all of the repercussions potentially involved.

Concerns expressed anonymously will be considered at the discretion of the organisation. In exercising this discretion, the factors that will be taken into account might include:

- Whether it is the organisation's business
- The credibility of the concern
- The seriousness of the issues raised
- The likelihood of obtaining the necessary information

1.2 Procedure

Concerns should normally be initially raised with an appropriate level of line management (the immediate manager or his / her superiors). However, the most appropriate person to contact to report a concern will depend on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. Employees / sub-contractors may therefore contact the following individuals where a report to a line manager is not possible:

- David Wilson – Compliance and Health & Safety Manager
- Lee Bryson – Head of Commercial.

Whilst employees / sub-contractors will not be expected to prove the truth of an allegation that is made, it will be necessary to demonstrate to the person contacted that there are sufficient grounds for concern.

The organisation recognises the difficulty employees / associates can have reporting to their work colleagues but would always recommend that one of the people listed above be contacted. However, there may be times when this isn't appropriate, or you would prefer to remain anonymous. To allow for this, you can give your name but request confidentiality – the person you tell should make every effort to protect your identity.

1.3 Response

The action that will be taken by Business Waste will depend on the nature of the concern. Matters raised will be investigated by management – or they may be subject to independent enquiry. Relevant matters may also be subject to investigation by the police. However, in order to safeguard both the organisation and individuals, initial enquiries will be made to determine whether the commitment of resources to any form of investigation would be appropriate. The initial enquiries will also help determine the most appropriate process for the consideration of the concern. Any necessary action that is required urgently will be carried out ahead of any assessment / investigation process.

Concerns or allegations raised which fall within the scope of specific established procedures will be referred for consideration under those procedures.

A referral of a concern will be acknowledged, and an indication given of how the organisation proposes to deal with the matter, within 14 days. An indication of the likely timescales involved in providing a final response will also be provided. If it is not possible for initial enquiries to be completed within 14 days, the letter of acknowledgement will explain the situation. If a decision is made not to investigate, an explanation will be provided of the reasons for the decision.

Some issues may be investigated without the need for initial enquiries to be made.

Similarly, some concerns may be capable of resolution by agreed action without the need for investigation. The level of contact between officers who will consider the issues and the employee / sub-contractor expressing the concern will depend on the nature of the matters raised, the potential difficulties involved as well as the clarity of the information provided. Further information may need to be sought from the person expressing the concern.

Business Waste will take appropriate steps to minimise any difficulties that a member of staff may experience as a result of using the Whistleblowing Policy. The individual raising the concern will be given as much information as possible on the outcome of the

investigation, subject to the constraints of the organisation's duty of confidentiality or any other legal constraint. The objective of the various responses would be to ensure that a person expressing a legitimate concern can be assured that the matter has been addressed.

The intention of the Policy is to provide an avenue for colleagues to raise matters within the organisation. Business Wastes require that colleagues do not disclose confidential, false or misleading information to an unapproved external organisation. Business Waste will maintain a record of all matters raised through the Whistleblowing Policy in order that an assessment may be made of the effectiveness of the Policy and any emerging patterns.

David Wilson

Compliance and Health & Safety Manager

31/03/2025 – Review date 31/03/2026