

Industrial Coating Services Limited (ICS) is committed to creating and maintaining a culture of openness so that individuals feel confident to raise any concerns relating to suspected misconduct at an early stage.

Senior management recognises the negative effect which malpractice can have on the organisation and therefore encourages individuals to raise general concerns or suspicions concerning misconduct.

The Public Interest Disclosure Act gives legal protection to employees against being dismissed or penalised by their employers as a result of disclosing certain serious concerns. Senior management have endorsed the provisions set out below to ensure that no one should feel at a disadvantage in raising legitimate concerns.

It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by the organisation nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures.

This policy is non-contractual and may be amended by us at any time.

#### **DISCLOSURES UNDER THIS POLICY**

You may make a disclosure under this Policy if you have genuine concern relating to any of the following areas of malpractice or suspected malpractice:

- Criminal activity;
- Miscarriages of justice;
- Practice endangering health and safety;
- Practices damaging the environment;
- Failure to comply with a legal obligation or statutes;
- Bribery;
- Financial malpractice, impropriety or fraud;
- Improper conduct or unethical behaviour;
- Attempts to conceal any of the above.

You are encouraged to report suspected wrongdoing as soon as possible. No action will be taken against individuals where a genuine concern is raised even if it is not confirmed by any subsequent investigation.

#### **CONFIDENTIALITY AND ANONYMITY**

Any disclosure you make under this policy will be treated as far as is reasonably practicable in a confidential and sensitive manner. If confidentiality is not reasonably practicable because of the nature of the information, for instance, this will be explained to you.

If you do not feel comfortable in making a disclosure openly, you may make the disclosure anonymously. However, concerns expressed anonymously cannot be dealt with as effectively as open disclosures as they are often more difficult to investigate.

#### **HOW TO MAKE A DISCLOSURE**

Concerns should be raised in the first instance with your immediate line manager who will inform the HSQE Manager. If the disclosure contains allegations about your immediate line manager or the malpractice occurs at this level, you may make the disclosure directly to the HSQE Manager.

If your allegation contains allegations which you do not wish to make to the HSQE Manager, you can make the disclosure to the Managing Director.

If your disclosure contains a very serious allegation the Managing Director will be notified.

#### CONTACT DETAILS

**HSQE Manager** 01543 450167

**Managing Director** 01543 450167

We encourage you to raise concerns internally; you may however contact 'Protect' who provide a free, confidential advice: **Website** – [www.pcaw.org.uk](http://www.pcaw.org.uk) **Telephone** – 020 3117 2520

#### NETWORK RAIL - REFUSAL TO WORK

All staff working on the railway infrastructure have a facility for reporting any safety concerns into a central, confidential reporting system – CIRAS (Confidential Incident Reporting & Analysis System).

CIRAS is an alternative way for rail industry staff to report safety concerns that they feel unable to report through company safety channels. It is a completely independent and confidential way to report safety concerns without fear of recrimination.

Reports can be made by: **Freephone** – 0800 4101101; SMS – send your contact details to 07507 285887; In writing – Freepost CIRAS, or via the CIRAS **Website** - [www.ciras.org.uk](http://www.ciras.org.uk)

#### INVESTIGATION

Once a concern has been raised it will be investigated. If you have not made the complaint anonymously you will be asked to attend a meeting as part of the investigation.

You will be kept informed as to the progress of the investigation, as far as is possible and appropriate bearing in mind and confidentiality obligations that apply. Please note you will not be given details of any disciplinary action taken unless we consider this appropriate.

Dissatisfaction with the outcome of the process - If you are dissatisfied with the outcome of the investigation, you should raise this with the Managing Director giving the reasons for your dissatisfaction. They will respond in writing notifying you of their acceptance or rejection of the need for further investigation and the reasons for this.

#### COMMUNICATIONS

All workers (employees, agency and contractor) will receive an appropriate briefing to ensure that they are fully aware of their rights and responsibilities under this policy. The policy will be available in the IMS, Employee Handbook and issued at induction to all new starters. Managers will be fully briefed as to their role in supporting this policy and the appropriate action to take in the event of any disclosure being made to them.

#### BREACH OF THIS POLICY

We may invoke the disciplinary action if you are found to have subjected a whistle-blower to any form of detrimental treatment. It may also be invoked if you have intentionally misled the organisation in respect of any matter, breached this policy in any other way and / or if we believe that you have made a false allegation maliciously.

**Signed:**



**Printed:** *Richard Parker, Managing Director*

**Date:** *January 2021*

**Review Date:** *January 2022*