



## Whistleblowing Policy

### Foreword

This Whistleblowing Policy enables anyone to raise genuine concerns about malpractice in the knowledge that their concerns will be taken seriously and that they will be protected from possible reprisals by colleagues and management.

This Whistleblowing Policy is applicable to both Anti-bribery policy and Equal Opportunities Policy including Harassment and Bullying.

### Why this policy is important and who it applies to

Ethical business practice is one of our guiding principles and the highest standards of conduct and business integrity are expected from every employee. If you have concerns that someone's conduct is, or could be, falling short of what we expect, we want you to speak up about it.

We understand that this can be a difficult thing to do and this policy aims to reassure you that anyone who reports, in good faith, any form of malpractice or behaviour which falls short of an acceptable standard will be protected.

This policy applies to all employees. The reporting channels and procedures are also available to temporary workers, agency staff and contractors whilst they are working for QHS.

Whistleblowing on any form of malpractice or unacceptable behaviour is always the right thing to do.

### Defining 'malpractice'

Malpractice is any form of behaviour that breaks the law, is unethical, or contravenes our vision and values.

The following are examples of malpractice:

- Creating a risk or potential risk to health and safety of any person
- Causing damage to the environment
- Abusing a position of authority
- Any victimisation, harassment, discrimination or act of abuse towards any employee
- Criminal activity committed by any person working for or on behalf of QHS, including bribery, corruption, fraud or theft
- Concealing or ignoring any of the above.

### We will protect you

If you speak up against or disclose information relating to malpractice in good faith, believing your information is accurate, we will protect you even if you are wrong.

Reporting on malpractice will not disadvantage your career or affect your relationships at work. That is why we will not tolerate any form of retribution, discrimination or bullying of anyone who has spoken up in good faith.



If any employee is subjected to harassment or victimisation by colleagues or management as a result of their actions, we will act immediately to stop it and will take disciplinary action against the perpetrators.

#### **Additional protection**

In certain circumstances, whistle-blowers are afforded protection by the Public Interest Disclosure Act 1998. A brief description of this Act and how you can find out more about it are included later in this policy.

#### **Seeking advice before you act**

If you feel you need advice from someone outside QHS, the independent charity Protect has an advice line: telephone 020 3117 2520.

#### **Malicious allegations**

Making a malicious allegation of malpractice is a serious offence and we will take disciplinary action against anyone who does so.

#### **How to raise a concern**

We recommend that you raise any concerns you have either by discussing them with your immediate manager or going on to QHS website <https://www.qhs.co.uk/Contact-Us/Whistle-blowing-Facility>, fill in the Contact form and email it to Whistleblowing Inbox. All emails to the Whistleblowing Inbox are anonymous. The emails are taken by a committee of 3 persons who will act upon.

#### **Making a disclosure to your immediate manager**

If you honestly believe or have a reasonable suspicion that malpractice is occurring or is likely to occur, your first step should be to inform your immediate manager and your head of department.

The information you give will be considered carefully and they will decide whether there are grounds for investigation. You will be notified of the intended course of action. If the decision is to proceed with further investigations, one of the Directors will instigate the formal process.

If, having made a disclosure to your immediate manager and head of department, you are unhappy with the outcome, you can use the Whistleblowing email facility to report your concerns. You can always report your concerns directly to any of the Senior Management Directors (see Appendix A).

Using the QHS Website Whistleblowing facility, you can report your concerns about malpractice directly and anonymously on the Contact form, which will allow you to insert the level of details that you are comfortable.

The Contact form will have a reference number so that you can follow what actions have been taken by the company in relation to your report. On any correspondence quote the reference number allocated to your report.



## **What happens next?**

### **The investigation**

Where an investigation is required, it will be formally initiated by the Business Development Director. In order to maintain confidentiality and carry out an effective internal investigation, the number of personnel involved will be kept to a minimum.

In the interests of confidentiality and fairness, you should not discuss the matter further and you will not be contacted unless you have indicated that you are willing to be contacted by someone directly involved in the investigation.

You will be able to follow the progress of the investigation on line or be able to email the Whistleblowing Inbox again, using the reference number with which you were provided when you made your report. The report will advise you of the progress of the matter including when the investigation has been completed and, where possible, you will be told of the outcome.

### **Appeals procedure**

If you are unhappy with the conduct or outcome of an investigation, you should raise your concerns with Managing Director or Service Delivery Director. You must do this within ten (10) working days of being notified of the outcome of the investigation.

The Managing Director or Service Delivery Director will review the investigation, together with a member of our Senior Management Directors who is unconnected with the process, and they will take any further action that is appropriate. Their decisions will be final.

You will be notified of the outcome their review and of their final decision.

### **Public Interest Disclosure Act 1998**

This Act of Parliament, popularly known as the "Whistle-blower's Act" provides a framework within which workers can inform on illegal, unsafe and improper practices by their employers or colleagues.

Whistle-blowers who make disclosures that qualify for protection under the Act have the right not to suffer detrimental treatment from their employer.

The publication "Guide to the Public Interest Disclosure Act 1998" sets out details of the types of disclosures which qualify for protection and the way in which such disclosures can be made, as well as the persons to whom disclosures may be made.

You can obtain a copy of the Guide by accessing the DTI website at <http://www.dti.gov.uk/er/individual/pidguide-p1502.htm>





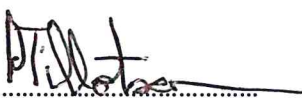
## Appendix A.

### The Committee:

- Patrick O'Brien - SHEEQ & Support Services Director
- Jim Briscoe – Business Development Director
- Angela Rotaru – Development Coordinator

### Senior Management Directors:

- Peter Tillotson – Managing Director
- Mario Pascoe – Service Delivery Director
- Patrick O'Brien – SHEEQ & Support Services Director
- Jim Briscoe – Business Development Director (Residential Services)
- Scott McGinty – Operations Director
- Wayne McNulty – Operations Director
- Tony Moloney – Business Development Director (Energy Services)

Signature.....

Position: Managing Director

Date: 31 January 2021

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