

RECCE
Site Investigation Limited

WHISTLEBLOWING POLICY

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Purpose

The purpose of this policy is to encourage employees and other workers to report genuine concerns about suspected wrongdoing, illegal activity, unethical conduct, regulatory breaches or risks to health, safety, the environment or the public interest without fear of retaliation.

Introduction

RECCE Site Investigation Limited is committed to maintaining the highest standards of honesty, integrity, openness and accountability in all aspects of its business. We encourage a culture in which employees and other workers feel confident to raise genuine concerns about suspected wrongdoing without fear of retaliation or unfair treatment.

Whistleblowing is the reporting of concerns that are in the public interest, including suspected illegal activity, malpractice, unethical behaviour, health and safety risks, environmental harm, fraud or any other serious misconduct. Early reporting of concerns helps the Company to investigate issues promptly, protect employees, clients and the public, and maintain the highest standards of corporate governance.

This policy has been developed in accordance with the Public Interest Disclosure Act 1998 (PIDA), as amended, which provides legal protection for workers who make qualifying disclosures in the public interest. RECCE Site Investigation Limited is committed to ensuring that no individual suffers dismissal, disciplinary action, detriment or any other form of retaliation as a result of raising a genuine concern in accordance with this policy.

This policy is intended to provide a safe and confidential process for reporting concerns relating to suspected wrongdoing within RECCE Site Investigation Limited. It is not intended to be used to raise personal employment grievances, disputes regarding employment terms or dissatisfaction with management decisions. Such matters should be raised through the Company's Grievance Policy, Disciplinary Policy or other relevant internal procedures.

Scope of Policy

This policy applies to all employees, directors, agency workers, consultants, subcontractors, apprentices, temporary workers, volunteers and any other individual working on behalf of RECCE Site Investigation Limited.

The policy provides a confidential process for raising genuine concerns where an individual reasonably believes that wrongdoing, illegal activity or other matters affecting the public interest have occurred, are occurring or are likely to occur. Concerns raised under this policy will be assessed and investigated as appropriate and may lead to the use of other Company procedures, including disciplinary action where necessary.

Examples of concerns that may be reported under this policy include, but are not limited to:

- Financial malpractice, fraud or theft.
- Bribery, corruption or other dishonest practices.
- Failure to comply with legal, regulatory or statutory obligations.
- Serious breaches of Company policies or procedures.
- Risks to health and safety.
- Environmental damage or breaches of environmental legislation.
- Criminal offences or suspected criminal activity.
- Unsafe working practices.
- Modern slavery, forced labour or other human rights abuses.
- Data protection or information security breaches.
- Deliberate concealment of any of the above.
- Any other conduct that could adversely affect RECCE Site Investigation Limited, its employees, clients, the public or the environment.

Safeguards

Protection

RECCE Site Investigation Limited is committed to ensuring that no individual who raises a genuine concern in accordance with this policy suffers dismissal, disciplinary action, victimisation, harassment or any other detriment as a result of making a protected disclosure.

To receive the protections provided by this policy, individuals should reasonably believe that:

- the information they are disclosing is substantially true;
- the disclosure is made in the public interest; and
- the concern is raised through the appropriate reporting channels set out in this policy.

Individuals who deliberately make false, malicious or vexatious allegations, or knowingly provide misleading information, may be subject to disciplinary action.

Confidentiality

RECCE Site Investigation Limited will treat all whistleblowing disclosures seriously and, wherever reasonably practicable, confidentially.

The identity of the individual raising the concern will only be disclosed where it is necessary for the investigation, required by law or where the individual has provided their consent. In some circumstances, the investigation process may require the individual to provide further information or a formal witness statement.

Information relating to whistleblowing concerns will only be shared with those who need access to it in order to investigate the matter appropriately.

Anonymous Disclosures

RECCE Site Investigation Limited encourages individuals to identify themselves when raising concerns, as this generally assists with a thorough and fair investigation.

Anonymous disclosures will still be considered where appropriate; however, they may be more difficult to investigate fully.

When deciding whether to investigate an anonymous disclosure, the Company will consider:

- The seriousness of the concern.
- The credibility of the information provided.
- The likelihood of obtaining sufficient evidence to investigate the matter.

Unsubstantiated Allegations

If an individual raises a concern honestly and with a reasonable belief that the information disclosed is substantially true, no action will be taken against them simply because an investigation is unable to substantiate the allegation.

However, where it is established that a disclosure has been made maliciously, for personal gain, or with knowledge that the information is false, RECCE Site Investigation Limited may take disciplinary action in accordance with the Company's Disciplinary Policy.

Procedures for Raising a Concern

Any individual wishing to raise a whistleblowing concern should report the matter as soon as reasonably practicable. Concerns may be raised verbally or in writing and should include, where possible, sufficient information to enable an appropriate investigation to take place.

Where a concern is received, the person receiving the disclosure must ensure that it is referred promptly to the appropriate investigating officer as follows:

- Concerns relating to employees or operational matters will normally be investigated by the relevant Director or a person nominated by them.
- Where the concern involves a Director, or there is a potential conflict of interest, the matter shall be referred directly to the Managing Director, who will appoint an appropriate independent investigating officer.
- Concerns relating to the Managing Director should be reported directly to the HR and Administration Director, who will appoint an appropriate internal or external investigating officer to ensure an impartial investigation.
- Any individual may bypass normal management reporting lines where they reasonably believe this is necessary due to the nature of the concern or a potential conflict of interest. In such cases, concerns may be reported directly to the HR and Administration Director.

Where appropriate, the Company may appoint an independent external investigator to ensure that concerns are investigated fairly, objectively and without conflict of interest.

If an individual is unsure whether a matter falls within the scope of this policy, they are encouraged to seek confidential advice from the HR and Administration Director before making a formal disclosure.

If there is evidence or reasonable suspicion of criminal activity, RECCE Site Investigation Limited will report the matter to the appropriate law enforcement or regulatory authority. Any internal investigation will be conducted in a manner that does not prejudice or interfere with any criminal or regulatory investigation.

Timescales

RECCE Site Investigation Limited is committed to investigating all whistleblowing concerns promptly, fairly and objectively.

The timescale for completing an investigation will depend on the nature, complexity and seriousness of the concern, including whether external organisations, regulatory authorities or law enforcement agencies need to be involved. Whilst it is not possible to specify exact timescales, every effort will be made to complete investigations without unnecessary delay.

The investigating officer will acknowledge receipt of the concern as soon as reasonably practicable and will keep the individual informed of the progress of the investigation, where appropriate and where this does not compromise confidentiality or the integrity of the investigation.

Where possible, the investigating officer will provide an update on the outcome of the investigation and any actions proposed or taken. However, certain information may not be disclosed where this would breach confidentiality, data protection requirements or legal obligations relating to other individuals.

Communication with the individual raising the concern will be treated confidentially and will be carried out using an agreed and appropriate method of contact.

Investigation Procedure

All whistleblowing concerns will be investigated fairly, objectively and without unnecessary delay. The nature and extent of the investigation will depend on the circumstances of the concern raised.

The investigating officer will normally:

- Obtain full details of the concern and any supporting information available.
- Assess whether the concern falls within the scope of this policy and determine the most appropriate course of action.

- Where appropriate, inform the individual(s) who are the subject of the concern and provide them with an opportunity to respond. This may be delayed where immediate notification could prejudice the investigation or any criminal or regulatory enquiries.
- Gather and review relevant evidence, including documentation, witness statements and other information necessary to establish the facts.
- Seek assistance from suitably qualified internal personnel or independent external advisers where specialist knowledge or impartiality is required.
- Notify the appropriate regulatory authority or law enforcement agency where there is evidence or reasonable suspicion of criminal activity or a legal obligation to report the matter.
- Prepare a written investigation report summarising the findings, evidence considered and any recommendations for further action.
- Submit the investigation report to the Managing Director or other appropriate decision-maker who is independent of the matters under investigation.

Following completion of the investigation, the Company will determine whether any further action is required. This may include disciplinary action, changes to Company procedures, additional training, referral to external authorities or any other corrective action considered appropriate.

The individual raising the concern will be informed, where appropriate, that the investigation has concluded. However, detailed information relating to disciplinary action, personal data or confidential matters concerning other individuals may not be disclosed.

Where an investigation identifies opportunities to improve Company policies, procedures or management systems, appropriate corrective actions will be implemented and monitored.

If the individual raising the concern believes that it has not been investigated appropriately after the Company's internal procedures have been exhausted, they may make a protected disclosure to a prescribed person or organisation in accordance with the Public Interest Disclosure Act 1998. Information about prescribed persons can be found on GOV.UK.

Monitoring and Review

RECCE Site Investigation Limited will monitor whistleblowing reports, investigation outcomes, corrective actions, legislative changes and improvement opportunities.

Relevant information shall be reviewed during Management Review meetings to ensure the continued effectiveness of this policy.

This policy shall be reviewed at least annually, or sooner where legislative, organisational or operational changes require review.

Related Documents

- Code of Conduct
- Disciplinary Policy
- Grievance Policy
- Anti-Bribery Policy
- Modern Slavery Policy
- Equality and Anti-Discrimination Policy
- Health and Safety Policy
- Data Protection Policy

Craig Barnett

Managing Director

