

# Whistleblowing

<b>Revision</b>	1.0	Signed by: <b>Eamonn Laverty</b> <i>Chief Executive Officer</i>	
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## Introduction

Our people are important to us. We want to promote a culture where those working for us, or with us, feel comfortable being able to raise any concerns that they have about illegal or unethical practice, or behaviours that are not in line with our ethical standards. We offer a variety of channels in which any such concerns can be reported, to encourage us all to be the absolute best we can.

We would encourage any suspected wrongdoing to be reported as soon as possible using any of the channels set out below. We will take any such reports seriously, investigate them as appropriate and respect your confidentiality. You can raise concerns about an incident that happened in the past, is happening now, or you believe will happen in the near future. Genuine concerns should be raised without fear of reprisals, even if they turn out to be mistaken.

This policy does not form part of any employee’s contract of employment and we may amend it at any time. Please also be aware that this policy does not apply to personal grievances – if you are an employee and have a concern about the way you are being treated as an individual, rather than a concern about practices in our business, you should follow the Company Grievance procedure which can be found in the Employee Handbook. A link to the Employee Handbook is available at the end of this policy.

## Who Does This Policy Apply To?

This policy covers all employees within McAleer & Rushe Contracts UK Limited and MRP Investment & Development Limited. Consultants, contractors and agency workers are also included in this policy, as well as those in our supply chain.

## What Is Whistleblowing?

“Whistleblowing” is the reporting of suspected wrongdoing in a business. This may include matters such as criminal activity, fraud, money laundering, offering or accepting a bribe, unethical conduct, danger to health and safety, failure to comply with, or breach of legal or regulatory requirements. It also covers

engaging in, or threatening to engage in detrimental conduct against a person who has made a disclosure (a “whistleblower”) or is believed to have, or be planning to make, a disclosure.

It is not necessary for you to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. You do not have the responsibility to investigate the matter - it is the Company’s responsibility to ensure that an investigation takes place.

## How To Raise A Concern

We would encourage you to speak with your Line Manager in the first instance if you have any concerns. This could be in person, or in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively.

If you prefer not to raise your concerns with your Line Manager or you feel your Line Manager has not addressed your concerns, then you should contact one of the following:

- (a) The Human Resources Department
- (b) Safecall, our confidential and independently provided reporting service. You can find full details at the end of this policy.

## Keeping Things Confidential

We hope that you will feel able to voice whistleblowing concerns openly under this policy as it enables us to obtain further information from you if necessary. However, if you have requested to remain anonymous we will take all reasonable steps to ensure this is the case.

Anonymity would only be broken where it is reasonably necessary in order to allow for thorough investigation, or to deal with the malpractice, we would always try to discuss this with you first. We will endeavor to ensure that you are not put at a disadvantage as a result and would address any negative behaviour in accordance with our disciplinary process.

## What Happens Once I Have Raised A Concern?

Once you have raised a concern, an initial assessment will be carried out to determine the scope of any investigation. We aim to ensure that any investigation is as fair and proportionate as possible.

In some cases, we may appoint an investigator or team of investigators, including employees with specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing. Where necessary we may employ an external investigator to ensure impartiality.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

Where appropriate we will aim to update the reporter at the conclusion of an investigation with any appropriate actions taken. This is subject to confidentiality and where necessary certain information may be redacted to protect the business or individuals.

If we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

## What If I Am Unhappy With The Outcome Of Your Investigation?

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.

If you are not happy with the way in which your concern has been handled, you can contact the Human Resources team. Contact details can be found at the end of this policy.

## Reporting Concerns Outside Of The Business

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator or other appropriate body (for example the Health and Safety Executive or the Construction Industry Council). It will very rarely, if ever, be appropriate to alert the media. We strongly encourage you to report internally first or, if this is not appropriate, seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list

of prescribed regulators for reporting certain types of concern. Their contact details are also included at the end of this policy.

Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider or business partner. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first. Please contact your Line Manager or the human resources team for guidance.

## Protection & Support For Whistleblowers

We appreciate that you may be worried about possible repercussions to you if you raise any concerns. We aim to encourage openness and wish to support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

Those who raise concerns must not suffer any detrimental treatment (such as being dismissed, disciplinary action, threats or other unfavourable treatment) as a result of raising a concern. If you believe that you have suffered any such treatment, you should inform the Human Resources Team immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure, which can be viewed within our Employee Handbook.

Anyone found to have treated whistleblowers unfairly may be subject to disciplinary action. In some cases the whistleblower could have a right to sue you personally for compensation in an employment tribunal.

Employees can also access our independent and confidential Employee Assistance Programme and advice service ('EAP') which is available 24/7, 7 days a week. This is free to access and contact details can be found on Insight or on the link at the end of this policy. Alternatively, you can speak confidentially to a member of the Human Resources team for support or guidance in using the EAP.

## Appendix 1

### Contact Information

#### Reporting

##### Human Resources

Call 028 8676 3741

Email [human.resources@mcaleer-rushe.co.uk](mailto:human.resources@mcaleer-rushe.co.uk)

##### Safecall

Our confidential and independent hotline: 0800 915 1571

List of Freephone Numbers: [www.safecall.co.uk/freephone](http://www.safecall.co.uk/freephone)

Report via website: [www.safecall.co.uk/report](http://www.safecall.co.uk/report)

Safecall provide an independent confidential reporting facility where you can raise concerns about malpractice or wrongdoing

within McAleer & Rushe. Reports are handled by skilled staff and can be completely anonymous. A report of your concern will be sent to Senior Management within McAleer & Rushe.

You can contact Safecall on the freephone numbers that are applicable to your location above, in your preferred language. Alternatively you can also file a report via the Safecall website.

The Safecall service is available 24/7 365 days a year.

Details of the Safecall service can also be found on posters and the McAleer & Rushe Website: [Whistleblowing - Safecall](#)

## **Help & Advice**

### ***Employee Assistance Programme – Westfield Health***

Our confidential counselling and assistance programme:

Call 0800 092 0987

Website <https://www.westfieldhealth.com>

Access login code: 71718

### ***Protect***

Free, confidential and independent whistleblowing advice:

Call 020 317 2520

Website [www.protect-advice.org.uk](http://www.protect-advice.org.uk)

### ***Employee Handbook***

The McAleer & Rushe employee handbook can be viewed [here](#).