



WHISTLE BLOWING POLICY

PN Daly Statement

All of us at one time or another may have concerns about what is happening at work. Usually these concerns can be easily resolved. However, when they are about possible unlawful conduct, fraud, risks to the public or the environment, or other malpractice, it can be difficult to know what to do.

This policy is intended to help people who believe they have discovered malpractice or impropriety and to protect them from victimisation and reprisal should they raise concerns in the public interest or 'blow the whistle'.

Principles

This policy should be referred to when you have a concern about danger, or illegality in the workplace which would be in the public's and organisations best interest to have raised, as it could negatively affect others, such as customers, colleagues, or the public. This is also known as 'whistleblowing'.

A grievance is, by contrast, a dispute about your own employment position and has no additional public or colleague interest dimension.

This policy should not be used to reconsider any matters, which have already been addressed under grievance, disciplinary, or other procedures.

This policy will apply in cases where you genuinely believe that one or more of the following malpractices have occurred, is occurring, or is likely to occur. Examples of malpractices (but are not limited to):

- criminal offence.
- failure to comply with a legal obligation.
- miscarriage of justice.
- the endangering of an individual's health and safety.
- damage of the environment.
- a breach of the PN Daly Ltd code of conduct.
- bribery, corruption (including abuse of authority) or other forms of dishonesty.
- fraud or financial irregularities (including improper or unauthorised use of public funds).
- actions which are unprofessional, inappropriate or conflict with a general understanding of what is right and wrong, eg, actions which call into question the integrity of the work PN Daly Ltd undertakes; and



- deliberate concealing of information tending to show any of the above.

It is not necessary for you to prove the breach or failure you are alleging has occurred, or is likely to occur. You may simply raise reasonable suspicion.

If you make an allegation which is not confirmed by a subsequent investigation, no action will be taken against you. However, if it is discovered that you have made an allegation maliciously, disciplinary action may be taken.

Due to the varied nature of potential allegations, which may involve internal investigations and/or external bodies, it is not always possible to give precise timescales. However, a suitable Investigation Manager will be appointed who will ensure that the investigation is carried out as quickly as possible without affecting the quality and depth of the investigation.

PN Daly Ltd will treat all disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigations. You should be aware that sometimes the investigatory process reveals the source of disclosure and the person making the disclosure may need to provide a statement as part of the evidence required, for example, if police involvement is required.

PN Daly Ltd will not tolerate harassment or victimisation and will take action to protect our people when they raise a concern. Any harassment or victimisation will be treated as a serious disciplinary offence to be dealt with under the 'Disciplinary policy and procedure'.

All records relating to disclosures, any subsequent investigation and action taken will be managed in compliance with the [Data Protection Act 2018](#).

PN Daly Ltd encourages people to put their name to any disclosure they make. Concerns expressed anonymously are not automatically disregarded but may be considered at the discretion of the Managing Director and Chairman. In exercising this discretion, the factors to be taken into account will include:

- the seriousness of the issues raised; and
- the likelihood of confirming evidence for the allegation from reliable sources.

PN Daly Ltd recognises the lawful rights of people to make disclosures to prescribed persons such as the Health and Safety Executive and the Environmental Agency or, where justified, elsewhere. A full list of these prescribed bodies or persons can be found on the direct.gov.uk website.

Signed:

Frank Daly – Managing Director