

Whistle Blowing Policy

Raising a concern

If an employee experiences something in the workplace which they perceive to be a wrongdoing, it is important that the concern is raised straight away. Proof is not required as this is the company's responsibility. The employee must, however, have a reasonable belief that disclosing the information is in the public interest before raising a concern.

It is important to follow the correct procedure when raising a whistleblowing concern.

The following steps should be adhered to:

- The concern should, in most instances, be raised with the Line Manager
- There may be certain rare occasions, however, when this would be inappropriate because, for example, the concern:
 - May implicate the Line Manager in some way;
 - Is particularly serious and needs to be dealt with as a matter of urgency; or
 - Is about a senior manager within the line management chain or somewhere else in the company.

In these cases refer to the flowchart for the appropriate course of action. Colleague may also wish to raise matters outside of the line management chain with a male rather than a female. In these instances, they should contact the Finance Manager.

Where a concern has already been raised within the line management chain, but the employee feels that it has not been adequately addressed, they can raise the concern with the Managing Director. If an employee has used this procedure to raise a concern within the company and does not receive what they consider to be a reasonable response, they may raise the concern with the Chair of the Audit and Risk Assurance Committee. If an employee is still not happy, they can contact a prescribed person (see contact list in Annex B).

External disclosures

It is important that concerns are raised internally at the earliest time possible. This will enable the company to address and resolve any concerns quickly and by the most appropriate means. Swift Brickwork Contractors Limited is confident that there are sufficient internal avenues available to deal with any concerns raised.

Raising a concern outside the prescribed routes listed in this procedure, for example, with the media, campaign groups, on social media or with political parties, is protected by PIDA only in very limited circumstances and could, if it amounts to an unauthorised disclosure, result in disciplinary action.

Information needed to raise a concern

When raising a concern under the procedure an employee should try to provide the following information:

- The background & reason behind the concern;
- whether they have already raised a concern with anyone and the response; and any relevant dates.

This information should demonstrate that there are reasonable grounds for the concern to be acted upon.

It is important that matters are not investigated by employees themselves. Remember, proof is not needed, just a reasonable, honest belief that wrongdoing, has or is likely to occur.

If applicable, personal interests must be declared from the outset.

SCBL appreciates that this might be a difficult time for employees, who may feel uncertain about how to progress a concern. Support is available at all stages of the process is available from the charity Public Concern at Work.

Whistle Blowing Policy Continued

How the concern will be handled

All investigations will be conducted sensitively and as quickly as possible. While Swift Brickwork Contractors Limited cannot guarantee that the outcome will be as the employee may wish, it will handle the matter fairly and in accordance with this procedure.

Once a concern has been raised, a meeting may be arranged to determine how the concern should be taken forward. This may involve an internal inquiry or a formal investigation. Swift Brickwork Contractors Limited will establish who will be dealing with the matter and a written confirmation will be sent to the employee within 5 working days of the concern being raised.

If a meeting is arranged, the employee may wish to be accompanied by a trade union representative or a colleague who is not involved in the area of work to which the concern relates. The meeting can be conducted over the telephone rather than face-to-face.

Swift Brickwork Contractors Limited will aim to update the employee on the progress of the concern within 28 days where possible. However, in the event of a formal investigation or the involvement of police/security, it may not be possible or appropriate to provide full details. Swift Brickwork Contractors Limited will confirm when the matter is concluded and, if appropriate, the outcome of the investigation, maintaining security and confidentiality for all parties as far as possible. Throughout any investigation, the employee will still be expected to continue their duties/role as normal unless deemed inappropriate.

Confidentiality and anonymity

Normally, the best way to raise a concern is to do so openly, as this makes it easier for Swift Brickwork Contractors Limited to investigate and provide feedback. Any disclosures made under this procedure will be treated in a sensitive manner. Swift Brickwork Contractors Limited recognises that the employee may want to raise a concern in confidence, i.e. they may want to raise a concern on the basis that their name is not revealed without their consent.

Swift Brickwork Contractors Limited will respect any request for confidentiality as far as possible, restricting it to a 'need to know basis'. However, if the situation arises where it is not possible to resolve the concern without revealing the employee's identity (for example in matters of criminal law), Swift Brickwork Contractors Limited will advise the employee before proceeding. The same considerations of confidentiality should be applied to the employee(s) at the centre of the concern, as far as appropriate.

Employees may choose to raise concerns anonymously, i.e. without providing their name at all. If this is the case, the investigation itself may serve to reveal the source of information. Employees are therefore encouraged, where possible to put their names to concerns raised.

However, raising a concern anonymously is preferred to silence about potential serious wrongdoing. When anonymous concerns are raised they will be treated as credible, unless they are obviously a hoax, and investigated so far as possible. Where concerns cannot be validated, the managing Director must be informed for future reference.

Protection

If an employee follows the correct procedures when raising a concern they will not be penalised. If a concern is raised in the reasonable belief that it is in the public interest and procedures have been followed correctly, the employee raising the concern will be protected.

Where an employee has been victimised for raising a concern, Swift Brickwork Contractors Limited ensure that they will take appropriate action against those responsible.



M Walsh

Managing Director