

Whistleblowing Policy

About this policy

We are committed to conducting our business with honesty and integrity and expect all employees to maintain high standards. Part of this commitment involves encouraging you and/or others with serious concerns regarding any aspect of your work, the conduct of others or the running of the Company to report such concerns in confidence and with confidence.

Any suspected wrongdoing should be reported as soon as possible.

In most cases, these concerns or complaints can be dealt with through existing procedures. However, we do recognise that there may be occasions when you may wish to express concerns of a confidential nature and seek anonymity or at least some degree of confidentiality.

The aim of this Policy is to ensure that you feel able to do this without any risk of reprisal or victimisation. This policy covers all employees, casual or agency workers.

This policy does not form part of your contract of employment, and we may amend or withdraw it at any time.

What is whistleblowing?

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, facilitation of tax evasion, fraud or other criminal activity, miscarriages of justice, health and safety risks, risk/damage to the environment and any breach of legal or professional obligations.

Whistleblowing examples include:

- suspected fraudulent activity/serious management malpractices or unlawful behaviour (e.g., theft, misrepresentation, covering up wrongdoing)
- failures to comply with applicable regulations e.g., health and safety guidance
- failures to comply with Group policy
- reckless conduct in the workplace.

Whistleblowing is a disclosure of wrongdoing made in good faith and with reasonable grounds for believing it is in the public interest. Such disclosures afford whistleblowers protection from detrimental treatment for having raised their concerns.

How to raise a concern

We acknowledge that it may not be easy to report a concern, particularly one that relates to fraud, corruption, criminal behaviour, abuse, or other aspects of misconduct. However, we urge you to come forward with any concerns at an early stage, so that we can offer support before the problem has a chance to become serious.

We hope that in many cases you will be able to raise any concerns of wrongdoing with your manager. However, where you prefer not to raise it with your manager for any reason, you should contact the People Team or a Director. Contact details are at the end of this policy.

Please note that personal grievances (for example bullying, harassment, discrimination) are generally not covered by this whistleblowing policy, unless your case is in the public interest, i.e. it affects others.

Following receipt of an allegation of wrongdoing, we will arrange a meeting with you as soon as possible to discuss your concern. Whilst not a legal entitlement, we shall allow you to bring a colleague to any meeting under this policy but ask that they respect the confidentiality of your disclosure and any subsequent investigation.

You can be confident that by reporting suspected wrongdoing, this will not in any way affect your career prospects with us. This also applies if you come forward in good faith and with reasonable belief and, after investigation, it turns out that the matter has a genuine and innocent explanation.

Confidentiality

We hope that employees will feel able to voice whistleblowing concerns openly under this policy as, completely anonymous disclosures can be difficult to investigate. However, if you wish to raise your concern confidentially, we will make every effort to protect your identity and only reveal it where necessary to those involved in investigating your concern.

External disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any suspected 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. We strongly encourage you to seek advice before reporting a concern to anyone external. Protect operates a free confidential helpline for whistleblowers and their contact details can be found at the end of this policy.

Protection and support for whistleblowers

We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if, after investigation, these are deemed unfounded. If, however, it is concluded that a whistleblower has made false allegations maliciously, they may be subject to disciplinary action.

Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern in good faith. If you believe that you have suffered any such treatment, you should inform the People Team immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.


Anyone found to have threatened or retaliated against a whistleblower in any way may be subject to disciplinary action.

Contact Details

People Team	people@apemltd.co.uk
External UK (Protect)	Helpline: (020) 7404 6609 and (020) 3117 2550 whistle@protect-advice.org.uk www.protect-advice.org.uk
External Ireland (OPDC)	Protected Disclosure Commissioner +353 1 639 5650 info@opdc.ie www.opdc.ie

It is the responsibility of all APEM Group employees to comply with this policy and to report concerns. APEM Group prohibits any form of retaliation for the reporting of such matters.

All staff will be made aware of this statement as part of their induction on appointment and subsequent on-going training. This policy is communicated and published on the company website for all interested parties.

Reference	Version	Date released	Approved by
T1-GP-011	01	December 2023	Leah McGimpsey, Chief Executive Officer, APEM Group 
This policy is communicated and published on the company website for all interested parties.			
This policy is subject to periodic review and change to ensure it remains valid. The review period is annotated within the Version Control section, or the policy may be reviewed prior to this date when prompted by context, such as developments in legislation, industry practice, or the organisation.			
This Policy has been Equality Impact Assessed and no adverse impact has been identified.			