Clinisupplies

Whistleblowing Policy

Introduction

Clinisupplies aims to conduct business with the highest standards of ethics, honesty and integrity, and recognises that you have an important role to play in maintaining this aim.

The purpose of this policy is to encourage you to come forward with any concerns you may have regarding activity that could be putting people or our business at risk; explain the difference between whistleblowing and a grievance; and to provide guidelines if you feel you need to raise relevant issues to us under this policy.

This Whistleblowing Policy applies to all employees, workers, consultants, contractors and agency workers.

Please note, if you are an employee, the Whistleblowing Policy does not form part of your contract of employment and consequently we may review and amend the policy from time to time. A copy of the most up-to-date version will always be available on the intranet.

What is Whistleblowing?

Whistleblowing is the reporting of certain types of wrongdoing or dangers at work. Such information may include:

- criminal activity
- failure to comply with any legal obligation
- Actions which endanger the health and safety of employees or the public
- Actions which cause damage to the environment
- Actions which are intended to conceal any of the above

A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to such issues arising from our activities, you should report it under this policy.

However, if you have a personal grievance (e.g. a complaint relating to your conditions of employment, how you have been treated at work and/or your personal circumstances) these are not covered by this policy, so if you are an employee, please raise your concern under our Grievance Policy. If you are a consultant, contractor or agency worker, please raise any personal concerns directly with your Clinisupplies contact and/or your agency.

If you are uncertain whether something is within the scope of this policy, you should seek advice from the Chief People Officer.

The Public Interest Disclosure Act 1998 (often referred to as the Whistleblowers Act) protects workers from any detriment or from being disadvantaged where they make a 'protected disclosure'. This policy sets out the procedure that should be followed by anyone who wants to report such concerns and explains the process the company will follow to investigate such disclosures.

How to Report a Concern

In the first instance you should raise your concern with your line manager (or if you are a worker, consultant, contractor or agency worker, your main Clinisupplies contact) at the earliest opportunity. They have a responsibility to listen and respond to any matter that is of concern to you. Concerns can be raised verbally or in writing. Your manager/Clinisupplies contact may be able to agree a way of resolving your concern quickly and effectively.

If you have any evidence of the concern or alleged malpractice you should share this. Any personal interest in the matter should also be disclosed.

If you feel you cannot report the matter to your manager (or the concern involves your manager), you should approach a member of the leadership team or the Chief People Officer. If you are raising the concerns externally, please contact the HR Department at: HR@clinisupplies.co.uk. Alternatively, you can call the main phone line on 020 8863 4168 and ask to speak to the Chief People Officer.

Investigation

Once you have reported your concern we will promptly acknowledge receipt, if possible. This may not be possible if you have reported your concern anonymously or if you have not provided us with your contact details. We will then assess it and consider what action may be appropriate. This may involve an informal review, an internal inquiry or a more formal investigation.

If we need help from you investigating the issue we will be sensitive in seeking your assistance and will support you throughout the process. You will be given a contact who, where appropriate, will keep you informed of progress and agree a timetable for feedback.

Feedback on the outcome of any investigation will be shared with you wherever possible however it may not be possible to share in detail what action has been taken as this could infringe on the duty of confidence owed to others.

Whilst the company cannot guarantee that all matters will be responded to in the way you may wish, we will strive to handle your concerns fairly and appropriately.

Confidentiality and Anonymity

Normally, the best way to raise a concern is to do so openly and we hope that you feel able to voice any concerns without the need to do so anonymously. Openness makes it easier for us to assess the issue, obtain more information and thoroughly investigate the matter.

You are asked to provide your name and contact details when making a disclosure. We do not encourage people to make disclosures anonymously as we may not be able to take the matter further. Whilst it may be possible to investigate an anonymous disclosure, it can delay or hinder the process and may be more difficult to establish facts or take action. Reporting concerns anonymously prevents the company having the opportunity to clarify the issues, understand what has happened and provide you with feedback on the outcome of any investigation.

However, if you want to raise your concern confidentially or you wish to give your name on condition it is not revealed without your consent, please make this clear to the person to whom you report the matter. Following your request, we will make every effort to keep it confidential where possible (except where disclosure is required by law). If it is necessary for anyone investigating your concerns to know your identity, we will discuss this with you first.

The company will limit the number of people who are aware of the disclosure, seek your permission prior to disclosing your identity and take steps to ensure that victimisation does not occur.

External Disclosures

Hopefully this policy provides you with the reassurance that concerns raised will be taken seriously and that you will not suffer any detriment because of properly raising concerns. However, we recognise that there may be occasions where you may wish to raise your concerns with an external organisation, either because of dissatisfaction with the outcome of an internal investigation or inquiry or due to the serious nature of the issues.

The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline and can provide independent and confidential advice to you if you are unsure whether or how to raise a concern. Their contact details are as follows:

Helpline: 020 7404 6609
Email: whistle@pcaw.co.uk
Website: www.pcaw.co.uk

Protecting Those who Raise Concerns

You may be worried about reporting concerns for many reasons, including fear of getting yourself or others into trouble. Issues that are raised through the appropriate channels will be taken seriously and the law provides protection to those who raise concerns. To qualify for the protection afforded by the law, individuals must have a reasonable belief that:

- someone has committed, is committing or is likely to commit a criminal offence; or
- someone has failed, is failing or is likely to fail to comply with a legal obligation; or
- a miscarriage of justice has occurred, is occurring or is likely to occur; or

- the health and safety of any individual has been, is being or is likely to be damaged; or
- the environment has been, is being or is likely to be damaged; or
- information relating to any of the above has been, is being or is likely to be concealed.

Employees who make malicious or deliberately false disclosures are not protected under this policy and such conduct will be dealt with under our Disciplinary Policy as a matter of gross misconduct warranting summary dismissal.

Document Revision History

Document Name	Issue Date	Revision Date	Basic Details of Change
Whistleblowing Policy Rev 3	November 2017	31/08/18	Re-launch
Whistleblowing Policy Rev 4	November 2017	08/01/2026	Minor changes to job titles