

Whistle-blowing (Public Interest Disclosure) Policy

Purpose

Precision Colour Printing is committed to achieving the highest possible standards of service. In line with this commitment the Company expects individuals who have serious concerns that are in the public interest to raise these concerns with the Company at an early stage. This policy is intended to provide a framework for dealing with public interest disclosures by the Company's workers and other individuals who have dealings with the Company.

Scope

This policy applies to all employees, workers and contractors who provide services under contract to the Company, and also the Company's suppliers.

This policy is not contractual and maybe amended from time to time by the Company.

A Protected Disclosure

A "qualifying disclosure" means any disclosure of information by a worker is made in the public interest, and shows one or more of the following:

- That a criminal offence has been committed is being committed or is likely to be committed.
- That a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject.
- That a miscarriage of justice has occurred, is occurring or is likely to occur
- That the health or safety of any individual has been is being or is likely to be endangered,
- That the environment has been, is being or is likely to be damaged, or
- That information tending to show any matter falling within any one of the preceding paragraphs has been, or is likely to be deliberately concealed.

Individuals are protected by law against detrimental treatment (including dismissal) which arises because they have made a qualifying disclosure.

The difference between an individual complaint or grievance and a protected disclosure

It is important to understand the difference between complaints made by individuals about the way they are treated at work, and protected disclosures.

If the complaint is about how an individual is treated at work, for example a perceived breach of terms and conditions of employment or an instance of bullying, this is an individual grievance. The correct approach is to raise a grievance using the Company's grievance procedure.

A complaint by an individual about poor treatment at work is not a protected disclosure unless it also falls into the definition of a protected disclosure given above. For example, a complaint by an individual that he or she is being placed at risk by a breach of health and safety rules could be both an individual grievance and a protected disclosure.

Core Principles

The Company expects that disclosures made by its employees, workers, contractors or suppliers:

- Will be made in the reasonable belief that the disclosure is in the public interest and not (just) in the interest of the individual who makes the disclosure.
- Will be made openly at the earliest opportunity. The Company does not expect individuals to “sit” on information that should be disclosed.
- Will be made to the Company in the first instance and not to an outside body or agency. A disclosure to a lawyer for the purpose of taking legal advice is not a disclosure to an outside body.
- If possible, will not be made anonymously. This makes it easier for the matter to be investigated. The Company does recognise that individuals might wish to keep their identity confidential. If that is the case they should point this out clearly when making the disclosure.
- Will not be made in the pursuit of improper motives or personal gain.
- Is not spurious

The Company does not condone the unfavourable or detrimental treatment of any individual who makes whistleblowing disclosures. No person who makes a disclosure should be subjected to bullying, harassment or victimisation as a result. Legal protection against detriment arises only if the disclosure is a qualifying disclosure. Allegations of bullying, harassment or victimisation will be dealt with under the Company's Bullying & Harassment Policy and Disciplinary Procedure.

Procedure for raising concerns internally

Line manager in the first instance

Should individuals come across any wrongdoing or malpractice in the workplace that would be in the public interest to disclose, they should in the first instance raise concerns with their line manager. In many cases this will address and resolve the matter.

Alternative communication methods

If for any reason it is not appropriate to communicate a public interest disclosure to the line manager, perhaps because the line manager is suspected of involvement in the wrongdoing or malpractice, or if an individual wishes to escalate their concerns, they should write to:

The Head of HR
Precision Colour Printing
Haldane
Halesfield 1
Telford
Shropshire
TF7 4QQ

An initial confidential interview will be arranged to ascertain the area of concern. The individual will be asked whether their identity can be disclosed, as this will affect the investigation of the matter by the Company. The individual will be asked to make a written statement setting out details of the disclosure and supporting evidence.

The Company will then consider the disclosure and supporting evidence in order to make an initial determination as to:-

- Whether the disclosure is valid
- What, if any, further action should be taken

The individual may be asked to assist the Company by providing additional information.

If the Company decides that the individual's disclosure raises a valid concern that is not already the subject of internal or legal proceedings, the Company will decide upon the next course of action, which may include one or more of the following:

- If the matter can easily be corrected, a remedy;
- Referral of the matter to the Board of Directors with a view to conducting a full internal investigation and arriving at a remedy;
- Referral of the matter to the appropriate external regulatory body for investigation;
- Referral of the matter to the police

If upon initial assessment, or after investigation, the Company decides that the concern is not valid, is not true, or is not a matter for serious concern, the Company will provide the individual with a reasonable explanation of its decision. The Company's decision and reasons must be treated as confidential by the individual unless the Company decides otherwise.

Raising concerns externally

Individuals should only consider approaching external bodies or agencies if the internal procedure has not resolved their concerns and/or inadequate action has been taken to address their concerns.

If individuals do decide to take their concerns outside the Company, they should consider approaching an appropriate regulatory body with the authority to investigate the concern. For example, a health and safety issue should be reported to the Health and Safety Executive.

If individuals do take such a step, they should notify the Company of their intention. Please note that unjustified disclosures to the media will not be legally protected.

Abuse of the whistleblowing procedure

Disclosures under this procedure must be made in good faith and in the reasonable belief that they are in the public interest. The making of false, mischievous or frivolous disclosures, and the improper use of the whistleblowing procedure for personal gain or motive, will be treated as serious disciplinary matters.

Responsibilities

Individuals

- To make disclosure(s) in the public interest at the earliest possible stage in accordance with this policy.
- To make only genuine public interest disclosures where there is a reasonable belief that wrongdoing or malpractice is taking place.

Recipient of a Public Interest disclosure

- To ensure that concerns raised are taken seriously.
- Should facilitate a meeting with the employee to fully understand the extent and nature of the disclosure being made.
- Should respond in a timely manner and to keep the individual fully aware of progress.
- Are fully investigated and make an objective assessment of the concern.
- Have responsibility to ensure that the necessary action is taken to resolve a concern.