

1 Scope

This policy applies to all employees working for MWH Treatment and MWH Farrer (MWH).

This Policy is intended to enable those who become aware of wrongdoing in the business affecting some other person or service, to report their concerns at the earliest opportunity so that they can be properly investigated.

If your concern relates to your own treatment as an employee, you should raise it under the grievance process. Please see [MP59 Grievance](#) policy and [HR12 Grievance](#) process for more information.

2 Application

In this policy 'Whistle Blowing' means the reporting by employees of suspected misconduct, illegal acts or failure to act within the best interests of the Company, its employees and other stakeholders.

The aim of this Policy is to encourage employees and others who have serious concerns about any aspect of the MWH Treatment's work to come forward and voice those concerns.

Key related policies are:

- [MP61 Business Ethics – Intellectual Property](#)
- [MP84 Business Ethics – Principles](#)
- [MP86 Business Ethics – Conflicts of Interest](#)
- [MP90 Business Ethics – Anti-corruption, Anti-money Laundering and Trade Control Compliance Policy](#)

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4 What is Whistle Blowing?

Employees are often the first to realise that there may be something seriously wrong within the business. 'Whistle blowing' is viewed by MWH Treatment as a positive act that can make a valuable contribution to the Company's long-term success. It is not disloyal to colleagues or the business to speak up.

The reputation of MWH Treatment is determined by how every employee presents themselves and conducts business. Honesty, professionalism, ethical behaviour and integrity when interacting with others are the cornerstones of our reputation, which is key to our business success. The Company succeeds in the marketplace through superior performance, not by unethical practices.

4.1 Aims of the Policy

The Policy is designed to ensure that you can raise your concerns about wrongdoing or malpractice within MWH Treatment without fear of victimisation, subsequent discrimination, disadvantage or dismissal.

It is also intended to encourage and enable you to raise serious concerns within the business rather than ignoring a problem or 'blowing the whistle' outside.

This Policy aims to:

- encourage you to feel confident in raising serious concerns at the earliest opportunity and to question and act upon concerns about practice;
- provide avenues for you to raise those concerns and receive feedback on any action taken;
- ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied;
- reassure you that you will be protected from possible reprisals or victimisation if you have made any disclosure in good faith.

4.2 Who can raise a concern under this Policy?

Whistle blowers can be employees, suppliers, contractors, clients, or any individual who becomes aware of illegal business activities or areas of concern.

5 What Should be Reported?

Any serious concerns that you have about the way business is conducted or the conduct of officers or employees of the business or others acting on behalf of the business that:

- make you feel uncomfortable in terms of known standards;
- are not in keeping with business policies;
- fall below established standards of practice; or
- are improper behaviour.

These might relate to:

- conduct which is an offence or a breach of the law (a criminal offence has been committed or failing to comply with any other legal obligation),
- disclosures related to miscarriages of justice,
- racial, sexual, disability or other discrimination,
- health and safety of the public and / or other employees,
- damage to the environment,

- suspicion of modern slavery within MWHT workforce or supply chain (modern slavery includes slavery, servitude, forced and bonded labour, and human trafficking – see Glossary for definitions),
- unauthorised use of Company money or other assets,
- possible fraud and corruption,
- other unethical conduct.

This list is not exhaustive.

6 Protecting the whistle blower

This policy has been written to take account of the [Public Interest Disclosure Act 1998](#) which protects workers making disclosures about certain matters of concern, when those disclosures are made in accordance with the Act's provisions and in the public interest.

The Act makes it unlawful for the business to dismiss anyone or allow them to be victimised on the basis that they have made an appropriate lawful disclosure in accordance with the Act.

Rarely, a case might arise where it is the employee that has participated in the action causing concern. In such a case it is in the employee's interest to come into the open as soon as possible. The business cannot promise not to act against such an employee, but the fact that they came forward may be considered.

6.1 Harassment or victimisation

The Company is committed to good practice, high standards and to being supportive of you as an employee. We recognise that the decision to report a concern can be a difficult one to make. If you honestly and reasonably believe what you are saying is true, you should have nothing to fear because you will be doing your duty to your employer, your colleagues and those for whom you are providing a service.

The Company will not tolerate any harassment or victimisation of a whistle blower (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith and will treat this as a serious disciplinary offence which will be dealt with under the disciplinary rules and procedures.

6.2 Support to you

Throughout this process you will be given full support, your concerns will be taken seriously, and the business will do all it can to help you throughout the investigation

6.3 Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal your identity if that is your wish. If disciplinary or other proceedings follow the investigation, it may not be possible to act as a result of your disclosure without your help, so you may

be asked to come forward as a witness. If you agree to this, you will be offered advice and support.

7 Anonymous Allegations

This Policy encourages you to put your name to your allegation whenever possible. If you do not tell us who you are it will be much more difficult for us to protect your position or to give you feedback. This policy is not ideally suited to concerns raised anonymously.

Concerns expressed anonymously are much less powerful, and they may be considered at the discretion of the Company. In exercising this discretion, the factors to be considered would include:

- the seriousness of the issue raised,
- the credibility of the concern, and
- the likelihood of confirming the allegation from other sources.

8 Untrue Allegations

If you make an allegation in good faith and reasonably believe it to be true, but it is not confirmed by the investigation, the business will recognise your concern and you have nothing to fear. If, however, you make an allegation frivolously, maliciously or for personal gain, appropriate action may be taken which could include disciplinary action.

9 Raising a Concern

How you raise your concern will depend on the seriousness and sensitivity of the issues involved and who is suspected of the wrongdoing. You should normally raise concerns with:

- your Line Manager
- your Departmental Director
- via the confidential whistleblowing line [0844 892 4413](tel:08448924413).

For potential cases involving modern slavery, these should be reported via the confidential whistleblowing line or direct contact with the Head of HR, Legal Director or National Environmental and Sustainability Manager. All contact information is detailed in the [HRPD22-01 Modern Slavery Escalation Process](#).

Under no circumstance should MWHT or its employees attempt to intervene or manage an alleged occurrence of modern slavery. Suspicions and concerns will be reported to the appropriate external bodies as per the [HRPD22-01 Modern Slavery Escalation Process](#).

9.1 How to raise a concern

You may raise your concern by telephone, in person or in writing. The earlier you express your concern, the easier it is to act. You will need to provide the following information:

- the nature of your concern,
- why you believe it to be true,
- the background and history of the concern (giving relevant dates).

Although you are not expected to prove beyond doubt the truth of your suspicion, you will need to demonstrate to the person contacted that you have a genuine concern relating to suspected wrongdoing or malpractice and there are reasonable grounds for your concern.

You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns.

You may invite a colleague to be present for support during any meetings or interviews in connection with the concerns you have raised.

10 What will happen?

The business will respond to your concerns as quickly as possible.

Do not forget that testing your concerns is not the same as either accepting or rejecting them.

In order to be fair to all employees, including those who may be wrongly or mistakenly accused, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

The investigation may need to be carried out under terms of strict confidentiality, i.e. by not informing the subject of the complaint until (or if) it becomes necessary to do so. In certain cases, however, such as allegations of ill treatment of others, suspension from work may have to be considered immediately. Protection of those being ill-treated is paramount in all cases.

Within ten working days of a concern being raised, the person investigating your concern will write to you:

- acknowledging that the concern has been received,
- indicating how the business proposes to deal with the matter,
- supplying you with information on staff support mechanisms,
- telling you whether further investigations will take place and if not, why not.

The amount of contact between you and the officers considering the issues will depend on the nature of the matters raised, the potential difficulties involved and the clarity of your information. It is likely that you will be interviewed to ensure that your disclosure is fully understood.

Any meeting can be arranged away from your workplace, if you wish, and a colleague may accompany you in support.

The business will do what it can to minimise any difficulties that you may experience as a result of raising a concern. For instance, if you are asked to give evidence in criminal or disciplinary proceedings, the business will arrange for you to receive appropriate advice and support.

You need to be assured that your disclosure has been properly addressed. Unless there are any legal reasons why this cannot be done, you will be kept informed of the progress and outcome of any investigation.

For potential cases of modern slavery, the [HRPD22-01 Modern Slavery Escalation Process](#) will be followed. For further information refer to the [HRGD22-03 Modern Slavery Escalation Process Guidance](#).

11 Glossary of Terms

Employees	All persons holding a contract of employment working in the United Kingdom.
Modern Slavery	The severe exploitation and abuse of other people for personal or commercial gain. (<i>antislavery.org</i>)
Slavery	Slavery is when someone actually owns you like a piece of property. (<i>equalityhumanrights.com</i>)
Servitude	Servitude is similar to slavery - you might live on the person's premises, work for them and be unable to leave, but they don't own you. (<i>equalityhumanrights.com</i>)
Bonded Labour	Also known as 'debt bondage'. The world's most widespread form of slavery. People trapped in poverty borrow money and are forced to work to pay off the debt, losing control over both their employment conditions and the debt. (<i>antislavery.org</i>)
Forced Labour	Any work or services people are forced to do against their will under threat of punishment. (<i>antislavery.org</i>)
Human trafficking	The use of violence, threats or coercion to transport, recruit or harbour people in order to exploit them for purposes such as forced prostitution, labour, criminality, marriage or organ removal. (<i>antislavery.org</i>)