

Public Interest Disclosure (Whistleblowing) Policy

This policy document applies to your employment at Medicare Colgate Ltd, ("the Organisation") However, this policy does not form part of your contract of employment.

1. Policy Statement

This policy is intended to clearly set out and explain your rights and duties under the Public Interest Disclosure Act 1998.

2. Disclosing

The Organisation encourages and supports the internal reporting of any wrongdoing or potential wrongdoing to an appropriate member or members of the management. The disclosing of such information can also be made externally under the Public Interest Disclosure Act 1998.

3. Reportable Acts

3.1 All members of staff (including management) have a duty to report any actions, which they reasonably believe constitute wrongdoing or malpractice within the Organisation. Such actions include, but are not limited to:

- (a)** Theft, whether petty or serious.
- (b)** A criminal offence.
- (c)** Breach of Organisation's rules and procedures.
- (d)** Breach of statutory regulations, including health & safety.
- (e)** Dishonesty.
- (f)** Any attempts to cover-up or conceal any of the above.

3.2 Such information should be reported to your immediate manager as soon as it comes to light. If for whatever reason this is not practical the matter should be reported to *[Insert name and position, for example, personnel director or finance director]* or any other senior member of management.

4. Public Interest Disclosure Act 1998

The Public Interest Disclosure Act 1998 allows individuals to disclose certain information or issues relating to the Organisation to relevant external parties. This can take place if internal disclosure within the Organisation of such information may not result in any appropriate action being taken by the Organisation or where the disclosing party may be penalised in some way.

5. Reporting

All matters reported under this policy will be treated seriously and acted upon. The Organisation will, wherever possible, keep details of any disclosure or surrounding matter confidential in order to protect the disclosing party.

6. Investigation

6.1 Once a matter has been reported the Organisation will decide whether further investigation is required. Further investigation may take place internally or the matter may be passed to an external organisation or authority to investigate.

6.2 If any matter is investigated further, the further co-operation of the disclosing party may be required in order to progress and complete the investigation.

7. Protection of Disclosing Party

7.1 The Organisation will not allow any detrimental treatment of a disclosing party, where the disclosing party has acted reasonably and in good faith, even where an allegation or matter is subsequently found to be unsubstantiated.

7.2 It is a disciplinary offence to prevent or discourage a member of staff from reporting a matter or to treat such a member of staff in a detrimental way if they report or attempt to report a matter under this policy. Any disciplinary action taken due to a breach of this policy may ultimately lead to dismissal of the offending party.

7.3 If at any time you believe that you have suffered detrimental treatment as a result of reporting, seeking to report a matter or assisting or co-operating in any investigation you should immediately inform [*Insert name and position, for example, personnel director or finance director*] or any other senior member of management.

8. False Allegations

8.1 Knowingly false or malicious allegations made under this policy will not be tolerated, whether these allegations are made internally or externally.

8.2 The Organisation reserves the right to take disciplinary action against any employee making groundless allegations. Such disciplinary action may ultimately lead to dismissal.

9. Date of Implementation

This policy is effective from 14/4/23 and shall not apply to any actions that occurred prior to this date.

10. Questions

If you have any questions regarding this policy document and how it applies to you, please consult Alyson Baker.

11. Alteration of this Policy

This policy will be subject to review, revision, change, updating, alteration and replacement in order to introduce new policies from time to time to reflect the changing needs of the business and to comply with legislation. Any alterations will be communicated to you by Daniel Hall.