

Whistleblowing Policy Statement

GW Highways LTD is committed to high standards of integrity, honesty and accountability. We encourage those connected with our organisation to raise genuine concerns about wrongdoing or risks without fear of retaliation, discrimination or victimisation. This policy outlines how to report concerns, how they will be handled, and the protections available to those who speak up.

Scope:

This policy applies to:

- Employees (permanent, temporary, part-time and contract)
- Consultants, contractors, suppliers, and agency workers
- Board members, trustees, and volunteers

It covers concerns where you reasonably believe that one or more of the following is happening, has happened, or is likely to happen:

- A criminal offence
- Breach of a legal or regulatory obligation
- Miscarriage of justice
- Danger to health and safety
- Damage to the environment
- Deliberate concealment of wrongdoing

This policy is not for personal employment grievances unless they raise a wider public interest concern.

Reporting a concern:

Concerns should be raised as soon as possible through one of the following channels:

1. Line Manager or Supervisor – in most cases, concerns should be raised with the immediate manager.
2. Whistleblowing Officer – where line manager is not appropriate:
 Philippa Eadington (Finance Director)
 Tel: 07841 679490
 Email: philippa.eadington@gwhighways.co.uk
3. Alternatively, please contact any other Director.

Disclosures should include sufficient information to allow for a proper assessment and investigation, including relevant dates, individuals involved and supporting evidence.

Confidentiality and Anonymity

All disclosures will be handled sensitively and wherever possible in confidence. Anonymous reports will be accepted and investigated where sufficient information is provided, although anonymity may limit the extent of the investigation. Information will be handled in accordance with applicable data protection legislation.

Protection from Detriment:

GW Highways Ltd prohibits any form of retaliation, victimisation, or disadvantage against any individual who raises a concern in good faith under this policy. Any employee found to have engaged in retaliatory behaviour will be subject to disciplinary action. Individuals who knowingly make false or malicious allegations may also face disciplinary action.

Investigation Process:

All disclosures will be acknowledged promptly, normally within five working days. The Whistleblowing Officer will review the information to determine whether a formal investigation is required. Investigations will be conducted objectively, and confidentiality will be maintained as far as practicable. Where appropriate, findings and recommended actions will be reported to senior management or the Board. The whistleblower will be informed of the outcome to the extent that this is appropriate and lawful.

Record Keeping:

Comprehensive records of all disclosures, investigations, and outcomes will be maintained securely and retained in accordance with the organisation's record-management policies and data protection requirements.

Review:

This policy will be reviewed annually, or sooner if required, to ensure its continued effectiveness and alignment with legal and regulatory requirements.

Further information and Support:

Independent advice may be sought from Protect – www.protect-advice.org.uk

Policy Authorised By



David Gibbins, Director

POL015 Rev 1

12/11/2025



Luke Wenham, Director



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