



WHISTLEBLOWING POLICY

Whistle Blowing Policy

This policy has been implemented to show the company's commitment to accountability and to inform staff of how to make protected disclosures should the need arise.

The Public Interest Disclosure Act 1998 (PIDA), provides legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns.

This policy applies to all Directors, Employees or Workers and addresses the law in the area of whistleblowing, more formally known as making a disclosure in the public interest.

WHISTLEBLOWING has been defined as:

'the disclosure by an employee or professional of confidential information which relates to some danger, fraud or other illegal or unethical conduct connected with the workplace, be it of the employee or his/her fellow employees

(Public Concern at Work Guidelines 1997)

1. SCOPE OF POLICY

This policy is designed to enable employees and workers of the Company to raise concerns and to disclose information which the individual believes demonstrates malpractice or impropriety. This policy is intended to cover primarily concerns which are in the public interest. These concerns could include:

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or Statutes
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Attempts to conceal any of these

2. PROTECTION

Employees of the Company who disclose concerns under this policy are offered protection provided the disclosure is made in good faith and with the reasonable belief that malpractice or impropriety has occurred.

Timesco will not tolerate harassment or victimisation of employees who make a public disclosure in accordance with the PIDA and/or this policy. Any employee who is deemed to have harassed or victimised another employee for making a disclosure, will be dealt with under the company's disciplinary process.

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Timesco Healthcare Ltd Timesco House 3 Carnival Park Carnival Close Basildon Essex SS14 3WN England
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3. CONFIDENTIALITY

Timesco will be sensitive to employees who wish to make disclosures in confidence and will do its utmost, where possible, to protect an individual's identity if they do not want their name disclosed.

Where an investigation is required and statements are required from the employee/s as part of the evidence, these may be seen by all the parties involved. If legal action is taken then the employee may be required to give evidence in court.

4. ANONYMOUS ALLEGATIONS

Timesco encourages any employee raising a concern in the public interest to put their name to any disclosure they make. Concerns that may be expressed anonymously are less credible, but may be considered at the discretion of the Company.

5. MALICIOUS ALLEGATIONS

If an employee makes an allegation in good faith which is not confirmed by inquiry, the matter will be closed and no further action will be taken.

If an investigation shows that untrue allegations were malicious or made for personal gain then Timesco will consider taking disciplinary action against the reporting employee.

6. THE PROCEDURE FOR MAKING A PUBLIC DISCLOSURE

6.1 Concerns should be expressed to your Line Manager in the first instance. If the concern involves your Line Manager then the HR department should be your first point of contact. It is expected that the HR department will become the investigating Manager; however this responsibility can be delegated to an alternative Manager if it is deemed appropriate.

6.2 An employee has the right to bypass the Line Manager/HR structure and take their concern directly to the Director/s. The Director/s has the right to refer the concern back to the management if they feel that the management can effectively investigate the concern without any conflict of interest.

6.3 For the avoidance of doubt concerns should be addressed in writing and should include the background/any history, giving names, dates, and places where possible as well as explaining the reason for the employee's concerns.

6.4 If the employee is unsure whether to use this Policy or would like independent advice at any stage, you may contact the independent charity Public Concern at Work on 020 7404 6609. Their advisers can give you free confidential advice on how to raise a concern about malpractice in the workplace.

6.5 If the employee feels that they cannot express their concerns to the company directly, then they can raise their concerns with a third party. A list of prescribed bodies to which it may be appropriate to raise a concern with can be found on the government's website.

<https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2>

NB: If concerns are made outside of the company, employees should take care to ensure that it is one of the prescribed bodies. A public disclosure to anyone else could take an employee outside the protection of the Public Interest Disclosure Act.

7. RESPONSE TO A PUBLIC DISCLOSURE

7.1 Where an allegation has been made this will invoke an internal investigation which may lead to internal action being taken, or information being passed to the Police or other External Body as deemed appropriate.

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7.2 Due to the varied nature of concerns that could be raised, it is not always possible to lay down precise timescales for dealing with your concern. However, you will receive a written response within 5 working days acknowledging that your concern has been received, indicating how it is proposed to deal with your concern and providing an estimate of when a final response can be expected.

7.3 A final written response will be provided once all investigations have been completed and a course of action has been signed off by the Board of Directors.

7.4 All responses made to concerns raised under this policy will be provided in writing and sent to an employee's home address.

8. RECORDS

Records will be kept detailing the nature of the concern raised and any action taken and the reasons for it.

These records should be kept confidential and retained in accordance with Data Protection legislation.

9. RESPONSIBILITY FOR THIS POLICY

The Senior Management Team have overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations, and that all those under their control comply with it.

The Purchasing Manager has primary and day-to-day responsibility for implementing this policy and monitoring its use and effectiveness.

Management at all levels are responsible for ensuring that all those reporting to them are made aware of and understand this policy.

Angela Massey

Angela Massey
UK Sales & Marketing Manager