



# **Policies**

## **Railway Competence Group**

# **Whistleblowing Policy**

## **Purpose:**

RCG is committed to maintaining the highest standards of integrity and ethical conduct. We encourage all employees, contractors, and third-party service providers to report any suspected misconduct or violations of the law or company policies. This policy sets out the procedures for making a report, and the protections and support that will be provided to whistleblowers.

## **Reporting procedure:**

1. Any person who suspects or has evidence of misconduct or violations of the law or company policies should report it to their line manager or the Compliance Manager. If the line manager is implicated in the suspected misconduct, the report should be made directly to the Compliance Manager.
2. Reports may be made verbally or in writing. If the report is made verbally, the Compliance Manager will ask the reporter to follow up in writing to ensure that all relevant details are recorded.
3. The report should contain as much information as possible, including the nature of the suspected misconduct or violation, the individuals involved, the date and time, and any supporting evidence.
4. The identity of the whistleblower will be kept confidential, except as required by law or in the course of an investigation. Employees are encouraged to identify themselves to enable follow-up questions and investigations to be conducted more effectively.

## **Investigation procedure:**

1. The Compliance Manager will investigate all reports of suspected misconduct or violations of the law or company policies. The investigation will be conducted promptly, fairly and impartially.
2. The Compliance Manager will keep the whistleblower informed of the progress of the investigation, to the extent that is legally permissible and practical.
3. The Compliance Manager will take appropriate action to address any substantiated misconduct or violations of the law or company policies. This may include disciplinary action, termination of employment, and referral to law enforcement authorities if necessary.

## **Protection and support for whistleblowers:**

1. The company is committed to protecting whistleblowers from retaliation or reprisals. Any whistleblower who believes they are being subjected to retaliation or reprisals should report this immediately to the Compliance Manager.
2. Whistleblowers are protected by the Public Interest Disclosure Act 1998 (PIDA), which safeguards individuals who disclose information in the public interest and allows them to take legal action if they are victimized.
3. Whistleblowers will be provided with support and protection to the fullest extent possible under the law. This may include providing access to counselling, legal advice, and other forms of support.
4. The company will not tolerate any retaliation or reprisals against whistleblowers. Any employee who is found to have retaliated against a whistleblower will be subject to disciplinary action, up to and including termination of employment.

## **Whistleblowing concerns can relate to a wide range of issues, including:**

1. Fraud, corruption, and bribery: Any suspected fraudulent, corrupt, or dishonest activities, such as falsifying records, bribery, or embezzlement, must be reported.
2. Misuse of public funds: Any suspected misuse or embezzlement of public funds, including fraudulent claims or misuse of expense accounts, must be reported.
3. Criminal activities: Any illegal activities, including drug use or trafficking, theft, assault, or other criminal activity, must be reported.
4. Discrimination or harassment: Any suspected discrimination or harassment based on race, gender, age, religion, sexual orientation, or other factors must be reported.
5. Health and safety concerns: Any concerns related to unsafe working conditions, inadequate safety protocols, or other safety hazards must be reported.
6. Environmental concerns: Any concerns related to environmental damage or other ecological concerns must be reported.

These are just some examples of the types of concerns that may warrant whistleblowing. It is important for employees and apprentices to report any suspected misconduct, illegal acts, or failures to act correctly, even if they are not sure whether it rises to the level of whistleblowing. In general, it is better to report a concern and let the appropriate authorities investigate, rather than remain silent and potentially allow harmful behaviour to continue.

### **Roles and responsibilities:**

1. All employees, contractors, and third-party service providers have a responsibility to report any suspected misconduct or violations of the law or company policies.
2. The Compliance Manager is responsible for receiving and investigating reports of suspected misconduct or violations of the law or company policies, and for taking appropriate action to address any substantiated misconduct or violations.
3. Managers at all levels are responsible for promoting a culture of integrity and ethical conduct, and for taking appropriate action to prevent misconduct and violations of the law or company policies.

This policy is applicable to all employees, contractors, and third-party service providers of the company, and is subject to review and update as necessary.

### **Review**

To be reviewed annually. Last reviewed 18/02/23.

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