

## Whistleblowing process

### 1. Introduction

O'Hagan Civils Limited aims to maintain the highest standards of openness, decency, integrity and accountability in its work. Everyone who works with or for O'Hagan Civils Limited must be vigilant for signs of wrongdoing or criminal activity by individuals or organisations working with or for O'Hagan Civils Limited and are encouraged to report such behaviour using this policy.

This is a company-wide procedure and applies to employees, workers, agency workers, volunteers, partner organisations, donors, suppliers, agents, contractors or sub-contractors of O'Hagan Civils Limited or any person associated with O'Hagan Civils Limited wherever located.

This process is separate from and in addition to O'Hagan Civils Limited's grievance processes for employees or complaints process for internal and external people. If an individual is uncertain as to whether or not something is within the scope of this process, they should seek advice from their line manager, supervisor, foreman or a colleague.

O'Hagan Civils Limited will not tolerate the intimidation or victimisation of anyone raising a genuine concern under this policy. Anyone who tries to deter, intimidate or victimise an individual in a bid to prevent them from reporting a suspicion, will be subject to appropriate formal action and, if appropriate, may be reported to the relevant authorities.

### 2. Equal opportunities

O'Hagan Civils Limited aims to treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity.

### 3. What should be reported

A reportable act is one made in the public interest by an individual who has a reasonable belief that one of the following is being, has been, or is likely to be, committed:

- Criminal offences (e.g. fraud, bribery, corruption, money laundering, modern day slavery, supporting or involvement in terrorism).
- Failure to comply with legal obligations or regulatory requirements;
- A miscarriage of justice.
- Endangering someone's health and safety.
- Damage to the environment.
- Covering up wrongdoing.
- Unethical conduct.

Individual issues (e.g. bullying, harassment, discrimination) should be reported under O'Hagan Civils Limited's grievance policy (employees) or complaints procedure (volunteers, third parties etc).

Not reporting a suspicion when there are clear grounds for doing so could result in disciplinary action or other sanctions.

## 4. Procedure

- 4.1 Concerns should be raised as early as possible. Concerns may be raised verbally but preferably in writing or by email, giving any background and history, including relevant dates and any witnesses.

In the first instance, concerns should be raised with your immediate supervisor or line manager. However, if your

Supervisor or line manager is involved in the wrongdoing or you feel unable to raise the matter with your supervisor or line manager, you should report your concerns to one of the following:

- A more senior manager.
- The Operations Director.
- O'Hagan Civils Limited's dedicated whistleblowing email address [whistleblowing@ohagancivils.co.uk](mailto:whistleblowing@ohagancivils.co.uk).

- 4.2 An investigation will then be carried out. You must not investigate yourself, this could result in either the destruction or contamination of evidence or put your own safety at risk.

- 4.3 Following the investigation, the whistleblower will be informed of the outcome and what action will be taken, which may be to do nothing or to follow the full disciplinary procedure. However, the need for confidentiality may mean that the whistleblower cannot be given much detail.

The whistleblower shall be instructed to treat any information given to him / her regarding the investigation as confidential.

- 4.4 If you believe that your concern has not been dealt with properly or the wrongdoing is still going on, you should raise your concerns with an External Body (e.g. Police, Financial Services Authority, appropriate Regulatory Ombudsman, etc)

## 5. Anonymity

Individuals are encouraged to put their name to any whistleblowing disclosures they make. Concerns expressed anonymously will be considered at the discretion of O'Hagan Civils, taking into account:

- The seriousness of the issues raised.
- The credibility of the concern.
- The likelihood of confirming the allegation from attributable sources.

## 6. Confidentiality

O'Hagan Civils Limited will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

## 7. Reporting externally

If, on conclusion of the procedure in section 4, the whistleblower reasonably believes that the appropriate action has not been taken, he/she should report the matter to one of the following UK bodies:

- HM Revenue & Customs;

- the Financial Conduct Authority (formerly the Financial Services Authority);
- the Competition and Markets Authority;
- the Health and Safety Executive;
- the Environment Agency;
- the Independent Office for Police Conduct; and
- the Serious Fraud Office.

## 8. Malicious reports

Individuals who make malicious accusations under this policy ie those which are not true, may be subject to formal action (such as disciplinary action for employees or volunteer status review process for volunteers).

## 9. Useful contacts

If you require further advice, you can speak to your People Group representative or contact the confidential whistleblowing email address at O'Hagan Civils Limited [whistleblowing@ohagancivils.co.uk](mailto:whistleblowing@ohagancivils.co.uk).

Advice can also be obtained from outside O'Hagan Civils Limited through the whistleblowing organisation, Protect. This organisation is UK based, but can provide advice on whistle-blowing from other countries:

Telephone      +44 (0)20 3117 2520  
Email            [whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk)  
Website        [www.pcaw.co.uk](http://www.pcaw.co.uk)

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Operations Director