

Public Interest Disclosure Policy (Whistle Blowing Policy)

Document Information

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Approved by:	Sarah Butler – Managing Director
Author:	Sarah Butler – Managing Director
Owner:	Sarah Butler – Managing Director

This policy is:

- Effective from the Version and Issue date above. It supersedes previous versions, which are withdrawn, and hard copies destroyed.
- Effective for Datagraphic Limited and Datagraphic Group Limited (Herein referred to as “Datagraphic”).
- Uncontrolled when printed. The 'master' document is held securely within our IT system. All documents, policies and procedures are controlled following the procedure for controls and documents and records.
- Subject to change by Datagraphic in line with changes in statutory law, case law and best practice.



Public Interest Disclosure Policy

(Whistle Blowing Policy)

Datagraphic encourages an open culture in all dealings with employees and all the people with whom we come into contact. Effective and honest communication is essential if malpractice is to be effectively dealt with. The procedure below provides guidelines to all our employees, casual, temporary agency staff, freelancers, trainees, home workers and contractors, who feel they need to raise certain issues confidently.

The Public Interest Disclosure Act 1998 (commonly known as the 'Whistle Blowing Act') protects workers who raise legitimate concerns about specified matters from being dismissed by Datagraphic or being subjected to detrimental treatment or victimised by either Datagraphic or colleagues as a result, provided certain criteria are met. Certain disclosures qualify for protection, which are set out below. These are disclosures of information which a worker reasonably believes are made in the public interest and tend to show one or more of the following relevant failures is either happening now, took place in the past, or is likely to happen in the future.

- A criminal offence has been committed, including offences such as theft, fraud or acts of bribery
- A person has failed/is failing, or is likely to fail to comply with a legal obligation which they are subject to
- A miscarriage of justice
- A danger to the health and safety of any individual
- Damage to the environment
- Deliberate covering up of information tending to show any of the above five matters.

The procedure is not a substitute for the Disciplinary and Grievance policy and is not a channel for you to raise matters about your employment terms and conditions. The procedure allows you to have your concerns treated in confidence.

Your Protection

If you raise a genuine concern, you will not be at risk of damaging your position. Provided you are acting in the public interest, it does not matter whether your concern proves to be well-founded. You must, however, make your complaint to the right person and in the right way as detailed in this policy. Datagraphic does not, of course, extend this assurance to someone who acts from an improper motive and raises a matter they know to be untrue.



Your Confidence

Datagraphic will not tolerate the victimisation of anyone raising a genuine concern. Anyone responsible for such conduct will be subject to disciplinary action. You may decide that you want to raise a concern in confidence. Therefore, if you ask for your identity to be protected, it will not be disclosed without your consent. If it is not possible to deal with the concern without revealing your identity (for instance, because your evidence is needed in court or a disciplinary hearing), there will be a discussion as to whether and how we can proceed. This policy does not cover a situation where information about malpractice is received anonymously; however, discretion will be used to investigate such information.

How to Raise Your Concern

Stage 1: Internal Line Management

If you have a concern about malpractice, we hope you will feel able to raise it first with us or another senior person. This should be done in writing. It will help if you state the facts of the matter clearly. You can outline how you would like it to be investigated. If you have a direct or personal interest in the matter, you should also tell us at this stage.

Stage 2: Alternative Contacts

If you feel unable to raise the matter with someone in your line management, for whatever reason, please speak to the HR Dept (01926 353131). If you want to confidently raise the matter, we will ensure that practical measures are in place to protect your identity. We will contact you by the most secure means. We will not disclose your identity without your consent unless required by law. Once you have reported your concern, Datagraphic will investigate it to assess what action should be taken. We will tell you if your concern falls more appropriately within other policies. An appropriate person or external consultant will carry out the investigation.

The disclosure will be treated seriously and promptly investigated, and as part of the process, the worker will be interviewed and asked to provide a written statement. Once the Company has finalised the investigation, any necessary action will be taken. While this policy aims to enable us to investigate possible malpractice and take appropriate steps to deal with it, we will give you as much feedback as we can. If requested, we will confirm our response to you in writing. Please note, however, that we may not be able to tell you the precise action we take where this would infringe a duty of confidentiality owed by us to someone else.

If you are dissatisfied

If you are unhappy with Datagraphic's response, you may go to the proper authority. However, we do ask that matters are reported to the Company in the first instance. While we cannot guarantee that we will respond to all matters in the way that you might wish, the matter will be handled fairly and properly. By using this policy, you will help us to achieve this.



Document History

Date	Version	Author	Description of change
04/01/2016	1.0	C Eager	Policy released
30/10/2018	1.1	S Lovell	The biological Threat Section added
03/05/2020	1.2	K Wood	Layout changes, further information and job titles were added to the Document information page.
01/03/2022	1.3	T Harris	Updates to the new design template
11/10/2023	1.4	S Beech	Correction to document formatting amends to update Whistleblower advice line contact details.
11/03/2025	1.5	The HR Dept	Policy completely rewritten by HR Dept and approved by S Butler



Questions

If you have questions about the contents of this policy, please contact:

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Datagraphic

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Corporation

Registered companies:

Datagraphic Group Limited (Reg No: 01215380) and Datagraphic Limited (Reg No: 02913191).

Both registered in England at: Ireland Industrial Estate, Adelphi Way, Staveley, Chesterfield, S43 3LS.

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