

Securatex Ltd — Whistleblowing (Speak Up) Policy

1. Document control

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Related documents (controlled):

- IMS-PRO-INV-001 Incident & Investigation Procedure (internal)
 - IMS-PRO-COM-001 Complaints & Escalation Procedure (internal)
 - IMS-POL-COC-001 Code of Conduct (internal/public summary)
 - IMS-POL-IS-001 Information Security Policy (high-level statement)
 - IMS-PRO-NCR-001 Nonconformity & Corrective Action Procedure (internal)
- Distribution: All personnel; published public summary on website (optional)

2. Policy statement

Securatex Ltd is committed to operating lawfully, ethically and responsibly. We encourage all workers and stakeholders to speak up if they have concerns about wrongdoing, unsafe practices, unethical behaviour, security breaches, or any activity that could harm people, clients, the public, the environment, or Securatex Ltd's reputation.

We will:

- Provide clear, accessible reporting routes for whistleblowing concerns.
- Treat all reports seriously and handle them impartially.
- Protect those who raise genuine concerns from detrimental treatment or retaliation.
- Maintain confidentiality as far as reasonably practicable.
- Investigate proportionately and take appropriate corrective and preventive actions.
- Learn from concerns raised and continually improve our management system and operations.

This policy supports our Integrated Management System and aligns with recognised UK good governance and “speak up” principles.

3. Legal and standards context

This policy is designed to support compliance with:

- Public Interest Disclosure Act 1998 (PIDA) and relevant provisions of the Employment Rights Act 1996 (as amended) relating to protected disclosures and detriment/dismissal protections.
- UK Health & Safety duties (where applicable) and data protection requirements (UK GDPR / DPA 2018) with respect to handling personal data within reports and investigations.

It also supports ISO management system expectations for:

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- Leadership commitment, ethical conduct, worker consultation, reporting culture, corrective action, and continual improvement (e.g., ISO 9001/14001/45001/27001/18788 clauses on leadership, support, operation, performance evaluation, improvement).

4. Scope

This policy applies to:

- Employees, contractors, agency staff, consultants, volunteers, interns.
- Subcontractors, suppliers and business partners where relevant.
- Any person working for or on behalf of Securatex Ltd, in any location.

This policy covers whistleblowing concerns raised in the public interest about wrongdoing connected to Securatex Ltd's operations, clients, sites, events, or supply chain.

5. What is whistleblowing

Whistleblowing is raising a concern, in the public interest, about suspected wrongdoing. Examples include (not exhaustive):

- Criminal offences, fraud, theft, bribery, corruption.
- Breaches of legal obligations or regulatory requirements.
- Health & safety risks, unsafe systems of work, serious near misses concealed or unmanaged.
- Environmental harm or unlawful environmental practices.
- Misconduct, abuse of authority, unethical behaviour, serious policy breaches.
- Security breaches, unacceptable security practices, loss/compromise of sensitive information.
- Data protection violations (e.g., unauthorised disclosure of personal data).
- Deliberate concealment of any of the above.

What whistleblowing is not

Whistleblowing is not intended to replace routine HR processes for personal employment grievances such as pay disputes, rota disagreements, or interpersonal conflict. Those should normally be raised through the Grievance Procedure.

However, a grievance may become whistleblowing if it includes a genuine public interest concern about wrongdoing.

6. Principles

Securatex Ltd applies the following principles:

1. Good faith encouraged: Reports should be made honestly and based on reasonable belief. Evidence is helpful but not required.
2. Confidentiality: We will protect identity where possible, while recognising that some investigations may require limited disclosure.
3. Non-retaliation: No worker will suffer detriment for raising a genuine concern, even if it is not substantiated after investigation.

4. Fairness: Allegations will be handled impartially and proportionately. Individuals named in concerns will be treated fairly and given appropriate opportunity to respond where applicable.
5. Timeliness: Reports will be acknowledged and managed to defined timescales.
6. Record integrity: Reports and investigations will be documented and controlled.
7. Continuous improvement: Lessons learned will feed into corrective actions, training, supervision and IMS improvements.

7. Responsibilities

Managing Director (MD)

- Overall accountability for whistleblowing governance and resourcing.
- Ensures independence and impartiality of investigations.
- Reviews outcomes, authorises corrective actions, and ensures non-retaliation protections are applied.

Whistleblowing Officer (WBO)

(If not appointed, the MD will act as WBO until a named person is assigned.)

- Receives and logs reports.
- Conducts triage and assigns investigators.
- Ensures timescales are met, communications are maintained, and records are controlled.
- Escalates serious matters to the MD immediately.

Investigating Officer (IO)

- Plans and conducts investigations impartially.
- Maintains confidentiality and evidence integrity.
- Produces an investigation report with findings and recommendations.

All workers

- Raise concerns promptly and cooperate with reasonable investigation requests.
- Maintain confidentiality and avoid discussing allegations widely.

8. Reporting routes (Speak Up channels)

You may raise a concern through any of the routes below. Where possible, provide dates, locations, names (if known), and what you observed.

Primary channels

1. Email: whistleblowing@securatex.co.uk
2. Phone: [Insert number] (ask for “Whistleblowing Officer”)
3. Written: Whistleblowing Officer, Securatex Ltd, [Registered Office Address]

Alternative/internal route

If your concern involves, or could reasonably be perceived to involve, the Whistleblowing Officer or MD, you may report to:

- Operations Director / Senior Manager (if appointed): [name/contact], or
- Independent nominated contact: [name/contact], or
- Use the written route addressed “Private & Confidential – Whistleblowing” to the Company Secretary/Director.

Anonymous reports

Anonymous disclosures will be accepted and assessed. However, anonymity can limit our ability to investigate and provide feedback. If you are worried about confidentiality, we encourage you to identify yourself so we can protect you appropriately.

9. What happens after you report (process and timescales)

9.1 Acknowledgement

- We will acknowledge receipt within 2 working days where contact details are provided.

9.2 Triage and risk assessment

Within 5 working days, the WBO will assess:

- seriousness and immediacy of risk (safety/security/data);
- whether urgent controls are required (e.g., site suspension, immediate safeguarding actions);
- whether external notification is needed (e.g., emergency services, client duty officer, regulator);
- whether the matter is whistleblowing, grievance, complaint, or incident management.

9.3 Investigation

- A proportionate investigation plan will be created and an IO appointed.
- Target completion is 20 working days for standard cases.
- Complex cases may take longer; the reporter will be updated at least every 10 working days (if contact details provided).

9.4 Outcome and actions

Where possible and lawful, we will provide the reporter with:

- confirmation the matter has been considered;
- whether it was substantiated, partly substantiated, or unsubstantiated;
- the general nature of actions taken (without disclosing confidential personal data or compromising security).

Corrective actions may include:

- procedural changes, additional supervision, retraining;
- disciplinary action (where justified);
- contractual/supplier action;
- incident reporting and remediation;
- control enhancements (H&S, security, information security).

9.5 Escalation

If at any stage the matter indicates imminent risk to life, serious criminality, major data breach, or severe client impact, escalation to the MD (and relevant authorities/clients) will occur immediately.

10. Confidentiality and data handling

- Information will be shared only with those who need it to manage risk and conduct a fair investigation.
- Records will be stored securely with access controls consistent with our information security arrangements.
- Personal data will be processed lawfully and minimised to what is necessary for investigation and compliance.
- We will retain records in line with our retention schedule (see Section 13).

11. Protection from retaliation (non-detriment)

Securatex Ltd prohibits retaliation against anyone who raises a genuine concern. Retaliation includes (but is not limited to):

- dismissal, demotion, loss of work, reduced hours;
- threats, intimidation, harassment, bullying;
- discrimination, unfair performance management;
- blacklisting or reputational harm.

Any person who retaliates against a whistleblower may be subject to disciplinary action up to and including termination of contract/employment.

Workers who believe they have suffered detriment should report it immediately to the WBO/MD. Such reports will be treated as urgent and managed separately from the original allegation.

12. Malicious or knowingly false allegations

If an investigation determines that a report was made maliciously or knowingly false, Securatex Ltd may take disciplinary or contractual action.

This does not apply where a concern was raised honestly but is not substantiated.

13. Records, document control and retention

The WBO will maintain a Whistleblowing Register containing:

- unique reference number;
- date received;
- category (e.g., H&S, security, fraud, data);
- risk rating and immediate actions;
- investigation ownership and status;

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- outcome summary and corrective actions;
- closure date.

Retention: Whistleblowing records will be retained for 6 years from closure (or longer where required by client contract, litigation hold, or statutory requirements).

All records are controlled and protected against unauthorised access, alteration, or deletion.

14. Training, awareness and communication

- This policy will be communicated to all workers during onboarding and refreshed at least annually.
- Managers and supervisors will receive additional training on:
 - recognising whistleblowing concerns;
 - handling disclosures appropriately;
 - maintaining confidentiality and preventing retaliation.

15. Monitoring, audit and management review

The effectiveness of this policy will be reviewed through:

- internal audits;
- trend analysis (types of concerns, recurrence, time to close, corrective action effectiveness);
- worker feedback;
- management review inputs, including any systemic issues and improvement opportunities.

16. Review and continual improvement

This policy will be reviewed at least annually and additionally after:

- a serious whistleblowing case;
- significant organisational change;
- changes in relevant legal or regulatory requirements;
- audit findings indicating improvement needs.

17. Contact details (to publish on website)

Whistleblowing email: compliance@securatex.co.uk

Postal: Whistleblowing Officer, Securatem Ltd, 172 Stanley Green Road, Poole, Dorset, BH15 3AH

Telephone: 07742157861