



Company Rules, Policies & Procedures

Legislation may change before, during or after these Rules, Policies & Procedures have been issued or revised. In all cases legislative wording takes precedence.

DWT-233 Whistle blowing Policy 2026

1. Purpose

David Watson Transport Ltd is dedicated to fostering an open and transparent workplace culture where employees feel confident raising concerns. This policy ensures that staff who raise concerns are supported and treated fairly.

This document outlines the Company's general rules for whistleblowing. Employees should read this policy alongside their Main Terms and Conditions of Employment and the Handbook, which contains additional rules, policies, and procedures.

2. Definition and Scope

2.1 Applicability This policy applies to all employees of David Watson Transport Ltd.

2.2 Whistleblowing Defined Whistleblowing refers to reporting wrongdoing at work, where the whistleblower reasonably believes they are acting in the public interest.

2.3 Categories of Wrongdoing The statutory categories of wrongdoing include:

1. Criminal offences (e.g., fraud or illegal tax evasion)
2. Breaches of legal obligations
3. Miscarriages of justice
4. Endangerment to health and safety
5. Environmental damage
6. Deliberate concealment of any of the above
7. Sexual Harassment

2.4 Examples of Wrongdoing Examples include (but are not limited to):

- Unsafe working conditions
- Poor responses to safety incidents
- Inadequate staff training or induction
- Suspicions of fraud
- Bullying cultures (at team or organisational levels)
- Unwanted behaviour of a sexual nature that violates dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment

2.5 Reasonable Belief Employees do not need proof of wrongdoing to raise concerns. A reasonable belief is sufficient. Investigation is the responsibility of the organization, not the employee.

2.6 Protection Against Retaliation Employees making protected disclosures are legally protected from dismissal, detriment, or victimisation.

2.7 Concerns Outside Scope If the issue is not covered above, it should be reported to the relevant line manager.

2.8 Grievance Policy Personal employment concerns affecting only the individual should be addressed through the grievance policy.

2.9 Policy Review This policy will be reviewed annually by the Managing Director and senior management. Legislative changes will prompt immediate updates.

Version	05	Review Date	Document reviewed during March 2026
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3. General Rules

3.1 Encouragement to Raise Concerns David Watson Transport Ltd encourages employees to raise concerns internally and supports their legal rights under the Public Interest Disclosure Act 1998.

3.2 Commitment to Openness The Company fosters a safe, open culture where employees can raise concerns early.

3.3 Addressing Wrongdoing Fraud, misconduct, or wrongdoing will be investigated thoroughly and addressed appropriately.

3.4 Internal Reporting Mechanisms Employees are encouraged to use internal mechanisms to report issues. Serious concerns will be investigated, and employees raising concerns will be treated respectfully.

3.5 Escalation Options If dissatisfied with the response, employees can escalate the matter further. Whistleblowers will be protected from harassment or victimisation.

4. Roles and Responsibilities

4.1 Senior Management Team

- Promote an open culture through actions and strategy
- Review whistleblowing reports

4.2 All Staff

- Report wrongdoing in accordance with this policy

4.3 Line Managers

- Ensure employees understand this policy
- Investigate raised concerns promptly
- Foster openness within teams
- Prevent whistleblower detriment
- Seek HR support when required

4.4 HR Department

- Oversee the whistleblowing process
- Provide guidance to employees and managers
- Investigate concerns thoroughly
- Report disclosures and actions to senior management
- Monitor and improve the process

5. How to Raise a Concern

5.1 Initial Reporting Concerns should first be raised formally or informally with the line manager.

5.2 Alternative Reporting If inappropriate or unresolved, employees can approach the HR Department directly.

5.3 Seeking Legal Advice For public-interest concerns, employees are encouraged to seek legal advice from organisations such as Protect (see Section 9).

5.4 External Reporting Employees can report concerns externally to prescribed bodies if they believe it is necessary (see Section 8).

5.5 Written Submissions Concerns should be submitted in writing, detailing names, dates, places, and reasons for disclosure. An interview can be arranged if writing is not possible.

5.6 Right to Accompaniment Employees may be accompanied during meetings and can request off-site meetings.

5.7 Burden of Proof Employees need only demonstrate reasonable grounds for concern, not prove allegations.

5.8 Confidentiality Requests Confidentiality will be maintained unless disclosure is legally required.

5.9 Anonymous Disclosures Anonymous reports are accepted but may limit feedback or follow-up.

6. How the Company Will Respond

6.1 Investigation Standards Concerns will be investigated promptly, thoroughly, and confidentially.

6.2 Confidentiality Assurance The employee's identity will remain confidential unless consent is given or legally required.

6.3 Initial Response Within five working days, the recipient will acknowledge receipt, outline next steps, and provide contact details.

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6.4 Investigation Timeline The whistleblower will be informed of the investigation timeline and progress updates.

6.5 Independent Investigation When necessary, a trained, independent investigator will review the concern.

6.6 Outcome Communication Employees will be informed of investigation outcomes and actions taken. Reasons will be provided if no action is taken.

6.7 Escalation Options If dissatisfied, employees may escalate concerns in writing to the Managing Director.

6.8 External Referrals Serious disclosures may be referred to external bodies for independent inquiry.

7. Harassment and Victimisation

7.1 Zero Tolerance Policy David Watson Transport Ltd will not tolerate harassment or victimisation of whistleblowers. This now includes explicit protection for workers who report sexual harassment as a protected disclosure. Disciplinary action will be taken against perpetrators.

7.2 Protection for Good Faith Reports No action will be taken against employees who raise concerns in good faith, even if mistaken.

8. Reporting to External Bodies

8.1 Prescribed Persons and Bodies If internal reporting is unsuitable, employees can contact prescribed external bodies such as:

- HM Revenue & Customs
- Serious Fraud Office
- Health and Safety Executive
- Environment Agency

The full list can be found at: [UK Government Website](#)

9. More Information and Support

9.1 Protect (UK Whistleblowing Charity)

- [Protect Advice Website](#)
- Email: whistle@protect-advice.org.uk
- Advice Line: 020 3117 2520 (Option 1)

9.2 Additional Resources

- [UK Government Whistleblowing Guidance](#)
- [Acas Whistleblowing Guidance](#)



Mark Watson
MANAGING DIRECTOR

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