



amlskills

Whistleblowing Policy



 0151 257 5138



www.amlskills.com

Whistleblowing Policy

Part 1: Policy details

1. What does this policy cover, and who is covered?

All employees, contractors, consultants, officers, interns, casual and agency workers are covered by this policy.

It sets out what they should do if they have reason to believe that something dangerous, unlawful or unethical is going on at work and it is affecting (or risks affecting) them or other colleagues.

When you report these kinds of concerns, this is called whistleblowing.

We are committed to operating at all times, and in everything that we do, to the highest standards of integrity.

However, all organisations can occasionally be affected by conduct that is dangerous, against the law or breaches ethical or professional codes.

Please follow the procedure outlined at Part II of this policy to immediately report any concerns that you have about this kind of conduct, so that we can take the necessary action to address these concerns as fast as possible.

This policy also covers the actions of third parties such as suppliers, service providers, and clients, as well as our staff. If you are concerned about a third party, please also raise them with us before approaching anyone else. AML Skills Ltd will be able to explain how you should proceed.

We will always take your concerns seriously and they will be thoroughly investigated by appropriate personnel. Most importantly, you should feel confident to follow the Part II procedure with confidence. There will be no reprisals for individuals who bring these concerns to our attention – we value and respect all such reports and those who make them to us. We all play an important role in ensuring that our business and everyone working in and with it acts professionally, lawfully and appropriately.

This is not an exhaustive list, but the types of concerns you may want to raise with us by whistleblowing could include:

- Any activity you suspect is criminal
- Any activity you suspect puts health and safety at risk
- Any activity you suspect may damage the environment
- Any activity you suspect breaches our policy on bribery and corruption



Head Office
AML Skills Ltd
Commerce House
Commerce Park
Wirral
Merseyside
CH41 9HP

Contact Details

t: 0151 257 5138

e: info@amlskills.com

w: www.amlskills.com

Whistleblowing Policy

2. It is not part of your employment contract

This policy is not part of your employment contract. We, AML Skills Ltd, may amend this policy at any time.

3. What sorts of activities are typically considered relevant to whistleblowing?

This is not an exhaustive list, but the types of concerns you may want to raise with us by whistleblowing could include:

- Any activity you suspect is criminal
- Any activity you suspect puts health and safety at risk
- Any activity you suspect may damage the environment
- Any activity you suspect breaches our policy on bribery and corruption
- Any failure to comply with legal or regulatory obligations
- Any failure to meet professional requirements
- Any attempt to conceal one or more of these activities

Please speak to AML Skills Ltd if you are unsure whether something that you are concerned about is covered by this policy.

Bullying or harassment

If your complaint is about the behaviour of others towards you, our bullying and harassment policy or grievance policy contain the relevant guidance on how to proceed. These types of behaviour are not covered by this whistleblowing policy.

4. Confidentiality and anonymity

You are always encouraged to raise concerns openly, and we actively discourage anonymous whistleblowing. This is because it is not always easy to manage and to investigate anonymous reports, especially since if we are unable to ask you for clarification for further details, we may struggle to clarify and find evidence to support your allegations and/or reach an informed conclusion. In these circumstances, we risk missing evidence or opportunities to gather important supporting information, or identify helpful witnesses, because we may simply be unaware of their existence, in spite of our best efforts to uncover them.

However, if you prefer to keep your identity anonymous, we will do all that we can to ensure that you retain your anonymity, and the confidentiality of your concerns, as far as possible. If we need to disclose your identity to others as part of the investigation, we will always discuss with you beforehand both our desire and our reasons for wishing to identify you.

We will protect you from reprisals, and you can read more about how we do this and what rights you have in section 5 below.



Head Office
AML Skills Ltd
Commerce House
Commerce Park
Wirral
Merseyside
CH41 9HP

Contact Details

t: 0151 257 5138

e: info@amlskills.com

w: www.amlskills.com

Whistleblowing Policy

5. We protect whistleblowers

There are no reprisals for mistakes or if following our investigations, (which we will always conduct thoroughly and conscientiously), we conclude that there has been no breach of law, policy or unethical conduct. However, to qualify for protection, the disclosure must, in the reasonable belief of the worker making the disclosure, show that one or more of the following events has happened, is happening or is likely to happen and that it is in the public interest to make the disclosure:

- A criminal offence
- Failure to comply with any legal obligation.
- Miscarriage of justice.
- Danger to health & safety of any individual.
- Danger to the environment.
- Deliberate concealment of any of any of the above.

If at any time, you do not feel that you have been fairly or properly treated by us in the handling of your whistleblowing concern, you must inform us immediately. You should inform AML Skills Ltd in the first instance; and if you are not satisfied with the outcome of that conversation, you should follow the process set out in our grievance policy.

We also protect whistleblowers from others, so where a whistleblower reports to us that they have been treated inappropriately by others, (including having received threats as a result of raising their concerns), we will take disciplinary action against those individuals. The consequences of us taking this action could include dismissal of such individual(s) for gross misconduct.

Whistleblowers may also be entitled to take legal action against those individuals.

If you would like more information about your rights as a whistleblower and how you are entitled to be protected, you can contact Public Concern at Work, which is an independent charity offering a confidential helpline on 020 7404 6609; www.pcaw.org.uk.

6. Whistleblowing to others outside of AML Skills Ltd

Our policy covers the process for raising, investigating, and resolving wrongdoing within AML Skills Ltd workplace.

The whistleblowing procedure that we have carefully put in place has been designed to ensure that to the best of our ability, we are able to resolve any concerns raised and to protect you as part of this process.

For these reasons, we anticipate that it would be extremely rare, if ever necessary, for you needing to involve anyone outside of AML Skills Ltd as part of this process.

However, we recognise that potentially, in exceptional circumstances, you might wish to involve an external body – an industry regulator, for example – and/or the independent charity Public Concern at Work, who can direct you towards the appropriate regulator for the type of issue you want to raise.



Head Office
AML Skills Ltd
Commerce House
Commerce Park
Wirral
Merseyside
CH41 9HP

Contact Details

t: 0151 257 5138

e: info@amlskills.com

w: www.amlskills.com