Irregularities, Malpractice and Whistle-Blowing Policy

1) Purpose

The purpose of this policy is to describe the employees' rights and responsibilities in relation to reporting Irregularities and Malpractice by individuals and / or the company.

Dauson Environmental Group is committed to ensuring that any allegations of malpractice within the organisation are taken extremely seriously. Employees are therefore encouraged to bring any such allegations to the Company's attention immediately. This is in the interests of the Company, its employees and the public. This Policy sets out the ways in which employees should bring any concerns to the attention of the Company and also explains how to raise the concerns outside the Company to appropriate external bodies in specific circumstances.

This Policy takes into account the protection provided for employees who bring matters of public interest to the attention of their employers or outside bodies which is provided by Part IV of the Employment Rights Act 1996 ("the Act") Public Interest Disclosure Act 1998 and also the right of freedom of expression which will be provided by the Human Rights Act.

2) Irregularities

Irregularities are situations where Dauson Environmental Group's operations do not meet the requirements set out in our company's policies and procedures and the relevant Awarding Bodies Qualification Specifications Dauson Environmental Group work with.

Monitoring Dauson Environmental Group's activities is a normal element in the organisation's operations. Our Managers, Sector Leads, Internal Quality Assurers and Quality Department along with Awarding Bodies External Quality Assurers constantly check that they meet all the relevant requirements.

The normal route is to use the quality assurance system to report on and initiate remedial action within Dauson Environmental Group - normally through an Action Plan, which spells the improvements or changes needed, by when and by whom. With this in place the Quality

Manager and Operations' Managers can follow up the specifics of the required improvements and ensure compliance.

3) Malpractice

For our purposes malpractice is defined as:

Immoral, illegal or unethical professional conduct or neglect of professional duty on the part of learners, Dauson Environmental Group staff or anyone else involved in providing a qualification, if it risks adversely affecting the integrity of Dauson Environmental Group.

a) If you suspect malpractice after learners have been registered, you must report it in writing to the Operations Manager within 5 working days of discovering it. Any company within the Dauson Environmental Group that knowingly fails to disclose, or delays disclosure of such information, risks Dauson Environmental Group's approval being suspended or withdrawn for qualifications with Awarding Bodies.

b) If a Dauson Environmental Group representative suspects any malpractice within a Dauson Environmental Group centre they must report it in writing to the Operations Manager, within 5 working days.

c) If Dauson Environmental Group receives a report of malpractice the Operations Manager acts straightaway, appointing technically competent personnel to investigate. The investigators compile detailed reports and evidence and Dauson Environmental Group will take appropriate remedial Action.

d) Dauson Environmental Group maintain records of all cases of malpractice and follow the policies and procedures of Dauson Environmental Group and that of all Awarding Bodies that Dauson Environmental Group operates the delivery and certifications of qualifications for.

4) Matters covered by this Policy

Employees are actively encouraged to raise concerns about any of the following matters which they think are or may be taking place within the Company in accordance with this Policy as soon as possible:

- Fraud
- Malpractice (e.g. financial irregularities, corruption, bribery, dishonesty)
- Commission of criminal offences

- Failure to comply with legal obligations
- Miscarriages of justice
- Dangers to health and safety
- Dangers to the environment
- Unethical conduct
- The deliberate concealing of information about any of those matters listed above.

This list is not intended to be exhaustive and employees are encouraged to raise any other concerns which they may have about any matters which threaten the interests of the Company, its employees or the public. Employees need to be aware that this Policy is not a substitute for the Company's Grievance Procedure, and any concerns about an employee's personal employment situation should be raised through the Grievance Procedure in the normal manner.

5) Procedure for Bringing these Concerns to the Attention of a Responsible Person

Concerns which employees have about any of the above matters, whether actual or potential, should be raised internally within the Company in the first instance. The employee should raise the matter with the Operations Director who will be responsible for investigating their concerns. In the event that it is inappropriate for the concerns to be raised with them, the concerns can also be raised with the Managing Director. These people shall be known as Compliance Officers. Concerns may be raised with the Compliance Officers, either orally or in writing.

The relevant Compliance Officer will in most cases hold a meeting with the employee to obtain information about their concerns. The Compliance Officer will then carry out further investigation depending upon the nature of the concerns that were raised by the employee.

The employee will be informed as far as possible about the outcome of the investigations, subject to the rights of any third parties which must be respected. In particular, the employee will be told what steps are to be taken to rectify or remedy any concerns which upon investigation were well founded.

If, after exhausting the internal procedures set out above, the employee remains dissatisfied with the way in which their concerns have been dealt with, the employee is then entitled to raise the issue externally. This should be done by taking the concerns to [the appropriate external regulatory body or bodies which may be relevant to the particular employer need to be described. Examples might be a Government Department, a Government Agency, the Inland

Revenue, the External Auditors, the Health and Safety Executive or the Financial Services Authority]. The employee should raise the matter with the external body which is appropriate in the circumstances, depending on the nature of the disclosure which is being made.

Employees should not raise concerns with external bodies other than official regulatory bodies, except in exceptional circumstances where the matter has already been raised internally within the [Company] and an official external body but it has not been satisfactorily resolved and in addition the employee believes that they will be penalised for making a disclosure elsewhere, that evidence may be concealed or destroyed, or their concern is of an exceptionally serious nature.

In these circumstances, the employee must act reasonably, and in particular, should think carefully about the seriousness of the allegations and the identity of the person or body with whom the concerns are going to be raised. For example, it would usually be more appropriate to bring concerns to the attention of an MP, or Local Councillor than to speak to the Press. If necessary, the employee should take legal advice as to whether a particular disclosure would be protected within the Act.

6) Confidentiality

Employees need to be sure that they can raise concerns about matters with the Company in confidence and without fear of reprisals. Therefore, all matters raised by employees under this Policy will be treated as strictly confidential. Names of employees making such allegations will not be revealed to those against whom any allegations are being made without that employee's prior consent.

If the employee requests that their anonymity be protected, the Company will endeavour to respect this.

The Company will also take reasonable steps to ensure that employees who have raised concerns under this Policy will not be victimised in any way by fellow employees or other members of the Company. The Company itself will not penalise employees in any way for raising concerns or making allegations in good faith in accordance with this Policy. The Act provides employees with specific protection against victimisation by their employers for making disclosures in accordance with that Act, upon which this Policy is based.

Victimisation or other unfavourable treatment of an employee or other member of the Company because that person has raised concerns under this Policy, or in order to deter that person from

raising such concerns, will not be tolerated and will be treated as a serious disciplinary offence under the Company's Disciplinary Procedure.

7) Abuse of this Policy

As outlined above, employees and other members of the Company will be protected by the Company against any victimisation as a result of proper use of the procedure laid out in this Policy. However, the Company will treat abuse of this Policy extremely seriously. If an employee abuses this Policy in order to make false or malicious allegations, this will be treated as a serious disciplinary offence under the Company's Disciplinary Procedure, which may result in disciplinary action being taken against the employee up to and including dismissal from employment.

Name: David Neal

Date: May 2026

Position: Director

Signature:



Next review: May 2027