

WHISTLEBLOWING POLICY

POLICY — COMPANY FILE

Raising a concern about wrongdoing — routes, protection, feedback and the log

KD-PQ-WB-009 Rev A0

Employment Rights Act 1996 Part IVA. A qualifying disclosure is a disclosure of information which, in the reasonable belief of the worker making it, is made in the public interest and tends to show — whether in the past, now or likely in future, in the UK or elsewhere — that a criminal offence has been committed; that a person has failed to comply with a legal obligation; a miscarriage of justice; that the health or safety of any individual has been endangered; that sexual harassment has occurred (added on 6 April 2026); that the environment has been damaged; or that information about any of these is being deliberately concealed (s.43B). It is protected when made to the employer, or — where the worker reasonably believes the matter relates solely or mainly to another person's conduct or responsibility — to that person (s.43C); in the course of obtaining legal advice (s.43D); or to a person prescribed for that kind of matter, where the worker reasonably believes it is within that person's remit and the information is substantially true (s.43F; the Public Interest Disclosure (Prescribed Persons) Order 2014). Wider disclosure, for example to the press, is protected only under the stricter conditions of ss.43G and 43H. For this Part a worker includes agency workers and some others supplied or engaged to do work (s.43K). A worker has the right not to be subjected to any detriment on the ground of a protected disclosure — by the employer, by a fellow worker, or by an agent acting with the employer's authority; what either of the last two does is treated as done by the employer too, and for a fellow worker's act the employer has a defence if it shows it took all reasonable steps to prevent it (s.47B). An employee dismissed because, or mainly because, of a protected disclosure is regarded as unfairly dismissed (s.103A). Any term of an agreement between a worker and the employer is void so far as it tries to stop a protected disclosure (s.43J). This law applies in England, Wales and Scotland; Northern Ireland has its own.

CAS v5 Q57 — the whistleblowing policy: the kinds of concern covered, the routes for raising one inside and outside the business, and the protection given to people who do (sections 2 to 6). CAS v5 Q58 — how the policy reaches the workforce (section 7 and KD-CAS-PB-005).

The question numbers are Build UK's; the descriptions are ours. This document records what the business does; the assessment body decides what it accepts. Version 6 of the question set is due on 1 November 2026 and is not yet published — check the numbers against the version you are assessed on. The independence statement is in the footer of every page.

1 THE BUSINESS

 add it in your PDF editor, or print and paste it here	BUSINESS NAME	COMPANY NO.	PEOPLE EMPLOYED	VERSION
	REGISTERED / TRADING ADDRESS		WHISTLEBLOWING OFFICER	
	POLICY DATE	APPROVING DIRECTOR	POSITION	NEXT REVIEW DUE

2 POLICY

This business wants to hear about wrongdoing, and wants to hear it early. Anyone who works for us or on our sites — directors, employees, agency and labour-only workers, subcontractors and their operatives, and people who used to work for us — can raise a concern. We will take it seriously, look into it, tell the person raising it what we can about the outcome, and make sure nobody is treated worse for raising a genuine concern. You do not need proof, only an honest and reasonable belief; a concern that turns out to be mistaken is still welcome. Knowingly raising a false concern to harm someone is misconduct.

3 WHAT COUNTS AS A CONCERN

- Health and safety — work carried on without the controls in its RAMS, a missing edge protection or an unplanned lift, asbestos disturbed, an accident or near miss not reported, inspection, test or thorough examination records filled in for checks that were never done.
- Building safety — fire-storing, cavity barriers or compartmentation left out or covered up, products swapped without the designer's agreement, work departing from the agreed design, defects hidden from building control, the principal designer or the principal contractor.
- Fraud and false records — inflated valuations, dayworks or variations; invoices for work or materials not supplied; false timesheets; false statements in a tender or pre-qualification. Bribery — see KD-PQ-AB-005. Tax evasion, such as cash-in-hand labour or false CIS paperwork — see KD-PQ-TE-010.
- Modern slavery and labour exploitation — see KD-PQ-MS-004. Sexual harassment — see KD-PQ-AH-011.
- Environmental damage — pollution to drains or watercourses, fly-tipping, waste handed to an unregistered carrier.
- Any other breach of the law — and any attempt to hide one of the matters above.

A report of sexual harassment — including harassment of yourself — can be raised under this policy as well as under KD-PQ-AH-011. Not the route for: a complaint only about your own pay or other treatment (that is a grievance — tell us anyway and we will route it); and immediate danger — stop the work, make it safe and tell the site manager now (stop-work notice KD-SITE-SN-012), then raise the concern.

4 HOW AND TO WHOM TO RAISE A CONCERN

Raise it in person, by phone, by email or in writing — with the first person below who is not involved in what you are reporting. Say what happened, where, when and who was involved, and what evidence exists. Do not investigate it yourself or confront anyone. You can raise a concern anonymously, but it is harder to look into and we cannot tell you the outcome. On a site where we are a contractor, a safety or building safety concern is also raised with the principal contractor — under CDM 2015 and, for building work, under the Building Regulations 2010 — and, where we design, with the principal designer; on a higher-risk building it also goes into the occurrence reporting system (KD-BSA-MS-003).

1 SUPERVISOR OR SITE MANAGER	2 WHISTLEBLOWING OFFICER — NAME AND ROLE	PHONE AND EMAIL
3 DIRECTOR — IF THE OFFICER IS INVOLVED	PHONE AND EMAIL	INDEPENDENT CONTACT (OPTIONAL)

WHISTLEBLOWING POLICY

continued

POLICY — COMPANY FILE

KD-PQ-WB-009 Rev A0

Outside the business. A worker may also go to a prescribed person — the regulator for that kind of matter. Among them: the Health and Safety Executive (health and safety at work, for the work it enforces); the Building Safety Regulator (building safety and building standards); HM Revenue and Customs (tax, national insurance and its criminal investigations); the Director of the Serious Fraud Office (serious or complex fraud); the Environment Agency, Natural Resources Wales or the Scottish Environment Protection Agency, depending on where the work is (the environment); the local authority, for the health and safety law it enforces; the Information Commissioner (data protection); and the Equality and Human Rights Commission (equality and human rights law). The list and each body's remit change: check the gov.uk page "Whistleblowing: list of prescribed people and bodies" before you display this page. A worker can also take legal advice at any time. If a crime is in progress or someone is in danger, call 999.

5 CONFIDENTIALITY AND PROTECTION

- The name of the person raising a concern is shared only with those who need it to look into the concern, or where the law requires — and we will talk to the person first. Records are kept in the confidential file, not the site file.
- Nobody is dismissed, disciplined, denied work or shifts, bullied or otherwise treated worse for raising a genuine concern. Anyone who does that to them — a manager, a colleague or a subcontractor — faces disciplinary action or removal from site.
- No settlement agreement, confidentiality clause or contract term of ours stops anyone making a protected disclosure.
- Support is available while a concern is looked into: say what you need to the officer.

6 WHAT HAPPENS NEXT — INVESTIGATION AND FEEDBACK

ACKNOWLEDGED WITHIN	FIRST UPDATE WITHIN	WHO INVESTIGATES
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The officer records the concern on the log below the day it arrives, decides who looks into it, and keeps the person who raised it informed. At the end they are told the outcome as far as confidentiality and the law allow — what was found and what was done, even where the detail cannot be shared. Where the law requires a report — an injury or dangerous occurrence reportable under RIDDOR 2013, a personal data breach (KD-PQ-DP-006), an occurrence on a higher-risk building — it is made regardless of the investigation. A person not satisfied with the response can take it to a director, or to a prescribed person.

Small firms: the question set gives no written-statement alternative for this policy, so every business needs one — it can be short. Where the whistleblowing officer and the only director are the same person, fill in the independent contact in section 4: a concern raised with a person this policy names is treated as raised with the employer (Employment Rights Act 1996 s.43C(2)).

7 RESPONSIBILITY, COMMUNICATION AND MONITORING

ROLE	NAME	WHAT THEY DO UNDER THIS POLICY

Evidence that the policy reached people: record each induction, briefing and issue on KD-CAS-PB-005 Policy Briefing and Acknowledgement Record — names, dates and signatures. Assessors ask for that record, dated within the last twelve months; only briefing people creates it.

HOW THE POLICY IS COMMUNICATED

HOW IT IS MONITORED, AND WHAT TRIGGERS AN EARLY REVISION.

8 SIGNED FOR THE BUSINESS

I adopt this whistleblowing policy for the business named in section 1. I will make sure concerns are heard and looked into, and that nobody is treated worse for raising one.

SIGNED — PRINTED NAME	POSITION	SIGNATURE	DATE	NEXT REVIEW DUE
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LOG — CONFIDENTIAL FILE

KD-PO-WB-009 Rev A0

One line per concern, entered on the day it arrives. Keep names, statements and evidence in the confidential file under the reference — not on this page — so that the log itself can be shown, if needed, as evidence that concerns are received and closed. Personal data here is handled under KD-PQ-DP-006.

LOG KEPT BY

LOG STARTED

KD-PQ-WB-009 | Rev A0 | Issued 2026-09-13 | Effective 2026-09-13 | Next review 2027-09-13
Approved for issue by: Author — director, UK principal contractor, SMSTS. Not an independent review.
TEMPLATE ONLY. A policy commits the business that signs it: write in what it actually does and can keep doing, strike out what it cannot, and hold the evidence it names. Not legal advice; holding it does not by itself satisfy any pre-qualification question or standard. Check the current revision at kubidoocs.com; printed copies are uncontrolled.
Basis: Employment Rights Act 1996 Part IVA (ss.43A to 43L), ss.47B and 103A; Public Interest Disclosure (Prescribed Persons) Order 2014; Common Assessment Standard question set Version 5 (Build UK, July 2025).
Built against the Common Assessment Standard question set, Version 5 (Build UK, July 2025). Independent — not affiliated with or endorsed by Build UK, Constructionline or any assessment body.

WHISTLEBLOWING POLICY

continued

LOG — CONFIDENTIAL FILE

KD-PQ-WB-009 Rev A0

R REVISION HISTORY

Every revision of this document, and every review that found nothing to change. The revision on the front of this sheet is the one you are holding — check kubitdocs.com for the current one before use.

Rev	Date	Class	What changed	Authorised by
D0	2026-09-13	first-issue	First issue.	— not yet approved —
A0	2026-09-13	review	Approved for issue by the author. Content unchanged from the reviewed draft; the draft status strip is removed. No independent third-party review has been carried out.	Author — director, UK principal contractor, SMSTS. Not an independent review.

Class: first-issue · material (the law, a control, a field or the scope changed — past buyers are notified) · editorial (wording or layout only) · review (checked, nothing changed) · withdrawal. Revision prefix D = draft, not approved and not for sale; A = approved for issue by the person named, on the date shown.