

WHISTLE BLOWING POLICY

PREPARED BY

Laura Ellis

APPROVED BY

Sian Adams

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1. ABOUT THIS POLICY

1.1

We, Vertex Company UK 1 Limited trading as Vertex Professional Services (in the following “VPS”) are committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards in accordance with our Code of Conduct. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

1.2

The purpose of this policy is:

- a) To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- b) To provide staff with guidance as to how to raise those concerns.
- c) To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

1.3

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Procedure as appropriate.

1.4

This policy does not form part of any contract of employment or other contract to provide services, and we may amend it at any time.

2. WHO DOES THIS POLICY APPLY TO?

2.1

This policy applies to all employees, officers, consultants, self-employed contractors, casual workers, agency workers, volunteers and interns, and all learners/employers involved in any activities.

3. WHO IS RESPONSIBLE FOR THIS POLICY?

3.1

The VPS Managing Director has overall responsibility for the effective operation of this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

3.2

The “Whistleblowing Officer” is our Chief Security Officer and has day-to-day operational responsibility for this policy and you should refer any questions about this policy to them in the first instance.

4. WHAT IS WHISTLEBLOWING?

4.1

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- a) criminal activity
- b) failure to comply with any legal [or professional] obligation [or regulatory requirements]
- c) miscarriages of justice
- d) danger to health and safety
- e) damage to the environment
- f) bribery
- g) facilitating tax evasion financial fraud or mismanagement
- h) breach of our internal policies and procedures including our Code of Conduct
- i) conduct likely to damage our reputation or financial wellbeing
- j) unauthorised disclosure of confidential information
- k) the deliberate concealment of any of the above matters.

4.2

A **whistleblower** is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a **whistleblowing concern**) you should report it under this policy.

5. RAISING A WHISTLEBLOWING CONCERN

5.1

We hope that in many cases you will be able to raise any concerns with your line manager. However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the following:

- a) The Whistleblowing Officer
- b) The Head of HR
- c) The Head of Contracts.

Contact details are set out at the end of this policy.

5.2

We will meet with you to discuss your concerns, normally within 2 weeks of the concern being raised, take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

6. CONFIDENTIALITY

6.1

We hope that staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

6.2

We do not encourage staff to make disclosures anonymously, although we will make every effort to investigate anonymous disclosures. You should be aware that proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible.

7. EXTERNAL DISCLOSURES

7.1

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

7.2

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external.

7.3

For information explaining how to make a direct disclosure to the ESFA and how they handle whistleblowing disclosures please view the following [How ESFA handles whistleblowing disclosures](#)

8. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

8.1

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

8.2

Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer or your line manager immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.

8.3

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action.

8.4

If however, we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

8.5

External advice and support can be obtained from:

- a) Protect, a whistleblowing charity - [Protect](#)
- b) [Whistleblowing for Employees](#) on the GOV.UK website.

9. CONTACTS

Whistleblowing Officer	Kenneth Harkett Email: KHarkett@gov2x.eu
Head of HR	Sian Adams Email: SAdams@gov2x.eu
Head of Contracts	Maria de Freitas Ebert Email: mdefreitasebert@gov2x.eu