Whistleblowing policy

ETL Whistleblowing policy

Version Control

Version number	Date	Description of changes
V1.1	May 2023	Policy template updated and new form created
V1.2	January 2024	Independent advice line added to section 'Raising your whistleblowing concerns externally'
V1.3	March 2026	Addition of Sexual Harassment as a protected disclosure in line with legislation change.
V1.4	October 2026	Removed "internal use only from footer" as scope covers external parties

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Introduction

Whistleblowing is one of the most effective ways of preventing and eliminating wrongdoing at work.

At ETL Systems we recognise that raising a whistleblowing concern can be daunting. However, we encourage you to report concerns internally as soon as possible where you suspect wrongdoing. We are here to listen and will take all concerns that you raise seriously.

This policy sets out the procedure for raising a whistleblowing concern and the support and protection that is available to you when you do so.

If your concern relates to a personal grievance that is not in the public interest (for example, an allegation of bullying or harassment, or an allegation that your contract of employment has been breached), you should raise it under our separate grievance procedure. If you are unsure about whether your concerns are best dealt with under the whistleblowing policy or grievance procedure, please speak to a member of the HR people team for further advice.

This policy does not form part of your contract of employment and we reserve the right to amend or withdraw it at any time.

Scope

This policy applies to all employees and workers employed by us. Other individuals, including our contractors, subcontractors, suppliers and volunteers are also encouraged to follow the procedure set out in this policy.

Whistleblowing concerns to which this policy relates

Whistleblowing is the act of reporting suspected wrongdoing or risk of wrongdoing relating to:

- a criminal offence;
- a failure to comply with a legal obligation;
- a miscarriage of justice;
- a risk to the health and safety of an individual;
- sexual harassment that has occurred, is occurring or is likely to occur
- damage to the environment; or
- an attempt to cover up any of the above.

It is not necessary for you to prove the wrongdoing. However, to be protected by whistleblowing laws against detrimental treatment or dismissal, you must reasonably believe that wrongdoing (related to one of the categories listed above) is being, has been, or is likely to be committed and that your disclosure is in the public interest.

Stage 1 - Raising a whistleblowing concern

If you have a genuine concern relating to any type of wrongdoing that is covered under this policy, you should raise it with either the Finance Director or the HR Director.

You can raise your concern orally, or in writing. We recommend that you use our *whistleblowing form* to raise a whistleblowing concern. It is important that you set out clearly:

- the details of the suspected wrongdoing;
- the names of any individuals involved; and
- and what action (if any) you are seeking.

In some cases, it may be necessary to ask you to attend a meeting to clarify the nature of your concern. This will be arranged as soon as possible. You may, if you wish, bring a colleague or a trade union representative with you to the meeting. Where it is considered appropriate, a member of the HR department may also be present.

Stage 2 - Responding to your whistleblowing concern

The director to whom you raise your concern will decide if an investigation is required and, if it is, the most appropriate person to conduct it. The relevant director will write to you confirming that they are conducting an investigation and the timescale for completion.

The level of investigation and time this will take will vary depending on the nature of the suspected wrongdoing.

Following the investigation, the relevant director will inform you in writing, as quickly as possible after completion of the investigation, of the outcome and any next steps or action that will be taken. While we aim to provide you with comprehensive feedback, in some cases this may not be possible, for example where data protection rules apply or there are sensitive issues that need to remain confidential.

Confidentiality and anonymity

We want you to feel comfortable about raising a whistleblowing concern openly and actively encourage you to do so. Where you raise a whistleblowing concern openly, we will maintain your confidentiality as far as possible. If we need to identify your identity to anyone, we will notify you beforehand.

In the alternative, you may decide to raise a whistleblowing concern anonymously. You can do this by using our form *whistleblowing form* without providing your personal details. We encourage anonymous reporting over remaining silent. Although we will investigate any concern that is reported anonymously as best we can, an anonymous report is likely to be more difficult for us to investigate and we will not be in a position to provide you with any feedback.

Our commitment to you

You have the right not to be subjected to any detrimental treatment (including being unfairly penalised, disciplined or dismissed) because you have raised a whistleblowing concern.

If you raise a whistleblowing concern in accordance with this policy, we will ensure that you are treated with respect and provided with adequate support and protection.

If you are told not to raise or pursue a whistleblowing concern, or you believe that you have been subjected to detrimental treatment because you have raised a whistleblowing concern, you should report the matter to the Finance Director, the HR Director or any member of the HR people team. In the alternative, you can raise it under our Grievance procedure if it applies to you.

Any such behaviour will not be tolerated and will be treated as a disciplinary offence. If we find that an individual has knowingly raised false allegations, this will also be treated as a disciplinary offence.

Raising your whistleblowing concerns externally

At ETL Systems we encourage you to raise your whistleblowing concerns internally in the first instance.

If you would like independent advice either before or after reporting to the designated contact at ETL, please use the following advice line (020 3117 2520) provided by the "Protect" whistleblowing charity. Further information on this advisory service is available here: https://protect-advice.org.uk/advice-line/

If you feel that appropriate action has not been taken, you should report the matter to the correct prescribed body or person (see list on GOV.UK).

You should seek advice if you are thinking of raising your concern with the media as you will not have protection under whistleblowing laws unless certain conditions are met.

Further guidance

If you need further guidance or support, you can contact the whistleblowing charity Protect or Citizens Advice for free confidential advice.