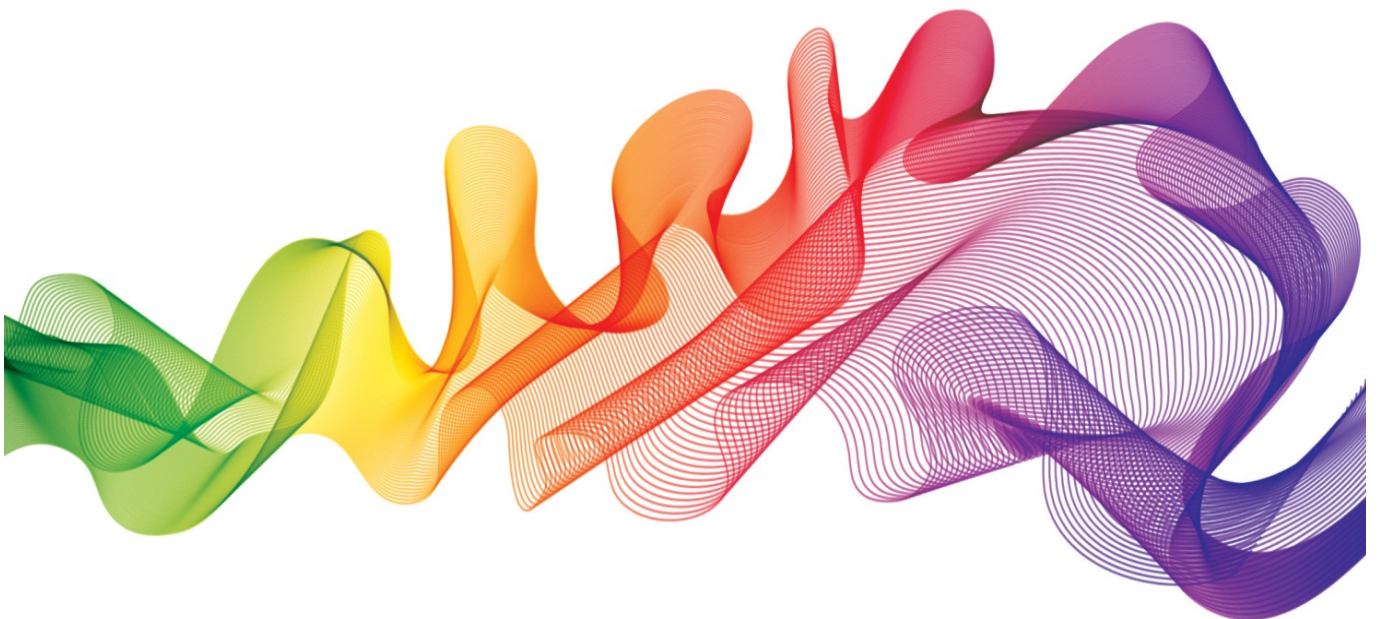


Whistleblowing Policy



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The Public Interest Disclosure Act 1998 protects workers who raise concerns about activities at work (whistleblowing) from victimisation or any other detrimental action.

The aim of this procedure is to encourage you to raise any genuine concerns you might have about certain wrongdoings within the company without fear of reprisal, to provide you with guidance on how to raise those concerns and to enable us to investigate such concerns and deal with them appropriately.

Eligibility

The TTE Technical Training Group is committed to maintaining the highest standards of honesty, transparency and accountability and takes any malpractice very seriously in all its business dealings. It is recognised that employees are often the first to know when someone connected with the Organisation is doing something wrong and you are encouraged to voice any concerns in accordance with the details set out below. As a whistleblower you're protected by law. TTE will not treat you unfairly or take your job from you as a result of whistleblowing. Please note however that any false report which is made with malicious intent or for personal gain could lead to disciplinary action.

Personal grievances (e.g. bullying, harassment, discrimination) aren't covered by whistleblowing law, unless you feel that the particular case is in the public interest. Personal grievance should be reported under our current grievance policy.

Activities Covered

There are definitive complaints that are able to make which are considered applicable to whistleblowing and are covered by this policy:

You're protected by law if you report any of the following:

- a criminal offence, e.g. fraud
- danger to the health and safety of any individual
- damage to the environment
- a miscarriage of justice
- a failure to comply with legal obligations
- the deliberate concealment of information concerning any of the matters listed above

This list is not exhaustive and the Organisation will evaluate any report which is in the public interest.

Raising a Concern

Although a concern can be raised to certain public authorities, the conditions under which this may be covered by the protection of the legislation are limited. Therefore, you should always raise a concern in the first instance with a member of the Senior Management Team SMT within TTE.

If you do not feel comfortable about making a report directly to your appropriate SMT Manager then you can instead report directly to the EDT.

The report can be made orally or in writing. If you choose to make a report orally you can bring a colleague with you if you wish. If you wish to raise the matter in confidence this should be made clear when you make the report.

Anonymous Reporting

You can make a report anonymously but it is then much harder to investigate and it is therefore best to declare your identity. Where you ask for confidentiality, we will do our utmost to protect your identity.

We will listen to your concern and decide if any action is needed. You may be asked for further information. You must say straight away if you don't want anyone else to know it was you who raised the concern. You won't have a say in how your concern is dealt with but we will keep you informed about the action we've taken, but we can't give you much detail if we have to keep the confidence of other people.

Being Treated Unfairly After Whistleblowing

If you feel your case has not been managed appropriately, you are able to raise a personal concern via the Grievance Policy in relation to your concerns.

You can take a case to an employment tribunal if you have raised a concern in line with this policy.

You can get further information from the Advisory, Conciliation and Arbitration Service (ACAS) or Citizens Advice or the whistleblowing charity Public Concern at Work. Alternatively, if you are a member of a trade union you may wish to seek further advice.

You must raise any claim of unfair dismissal within 3 months of your employment ending.

You must notify ACAS if you want to take your case to an employment tribunal.

Independent Advice

If you want independent advice at any stage you may want to contact Citizens Advice.

If you believe your concern wasn't taken seriously or the wrongdoing is still going on, you are advised to contact the Advisory, Conciliation and Arbitration Service (ACAS) or Citizens Advice or the whistleblowing charity Public Concern at Work. Alternatively, if you are a member of a trade union you may wish to seek further advice.

Status of this Policy

This policy does not give contractual rights to individual employees, workers or contractors. The company reserves the right to alter any of its terms at any time although we will notify you in writing of any changes.



Steve Grant
Group Managing Director
October 2018

