

Whistle Blowing Policy

Policy Review Record

This Revision Number and Effectiveness Date	Issue 4 Dated 10-08-2025
Department	HR Department
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Date of Last Review	August 2025
Next Review Date	August 2026
This Version Reviewed and Issued by	Harvey Parsons
Signature	
Position within GLP	Data and Quality Compliance Director

Introduction

- 1.1 GLP Training is committed to operating in an ethical and principled way. The aim of this policy and procedure is to provide employees and workers (referred to as 'workers' in this policy) with a means for raising genuine concerns of suspected bribery, breaches of the law and other serious wrongdoings.
- 1.2 GLP encourages workers to raise genuine concerns about suspected wrongdoing at the earliest practicable stage. This policy and procedure is intended to provide safeguards to enable members of staff to raise concerns about malpractice in connection with GLP.
- 1.3 This policy and procedure also aims to encourage workers to raise genuine concerns through internal procedures without fear of adverse repercussions being taken against them. The law allows workers to raise such concerns externally and this policy informs workers how they can do so. However, a failure to raise a concern under this procedure may result in a disclosure losing its protected status under the law.
- 1.4 This policy and procedure also seeks to balance the need to allow a culture of openness against the need to protect other workers against vexatious allegations or allegations which are not well-founded.
- 1.5 The principles of openness and accountability which underpin legislation protecting whistle-blowers are reflected in this policy and procedure. GLP is also committed to ensuring compliance with the Bribery Act 2010.

2. **Applicability of this policy and procedure**

- 2.1 This policy applies to all employees of GLP, including apprentices.

And

- 2.2 Workers which includes any workers; home-based workers; and employees or subcontractors.

And

2.3 Consultancy workers engaged by GLP.

2.4 Workers might be unsure whether it is appropriate to raise their concern under this policy and procedure or whether it is a personal grievance, which is more appropriate to raise under the grievance procedure. Any worker in this situation is encouraged to approach Human Resources Manager in confidence for advice.

3. Protected disclosures

3.1 The law protects workers who, out of a sense of public duty, want to reveal suspected wrongdoing or malpractice.

3.2 The law allows workers to raise what it defines as a 'protected disclosure'. To be a protected disclosure, a disclosure must relate to a specific subject matter (See Section 4 below) and the disclosure must also be made in an appropriate way (See Section 5). A 'protected disclosure' must, in the reasonable belief of the worker making it, also be made in the public interest. A protected disclosure must consist of information and not merely be allegations of suspected malpractice.

4. Specific Subject Matter

If, during employment, a worker becomes aware of information which they reasonably believe tends to show one or more of the following, they must use this policy and procedure:

- That a criminal offence has been committed, is being committed or is likely to be committed.
- That an individual has failed, is failing or is likely to fail to comply with any legal obligation to which they are subject.
- That a miscarriage of justice has occurred, is occurring, or is likely to occur.
- That the health or safety of any individual has been, is being, or is likely to be, endangered.
- That the environment, has been, is being, or is likely to be, damaged.
- That information tending to show any of the above, is being, or is likely to be, deliberately concealed.

5. Procedure for making a disclosure

5.1 Information which a worker reasonably believes tends to show one or more of the situations given in Section 4 should promptly be disclosed to their line manager so that any appropriate action can be taken.

5.2 If it is inappropriate to make such a disclosure to their line manager, a worker can raise the issue with Head of Department.

5.3 In the case of a complaint, which is any way connected with but not against the Senior Manager, the Chief Executive Officer will nominate another Senior Manager to act as the alternative investigating officer.

5.4 The complainant has the right to bypass the line management structure and take their complaint direct to the Chief Executive Officer, who has the right to refer the complaint back to a member of the Senior Management if they feel that the member of Senior Management team, without any conflict of interest can more appropriately investigate the complaint.

5.5 Workers are encouraged to identify themselves when making a disclosure. If an anonymous disclosure is made, GLP will not be able to notify the individual making the disclosure of the outcome of action taken by GLP. Anonymity also means that GLP will have difficulty in investigating such a concern. GLP reserves the right to determine whether to apply this procedure in respect of an anonymised disclosure considering the following considerations:

- The seriousness of the issues raised in the disclosure.
- The credibility of the concern; and
- How likely it is that the concern can be confirmed from attributable sources.

5.5 For further guidance in relation to this policy and procedure, or concerning the use of the disclosure procedure generally, employees should speak in confidence to Human Resources Manager.

6. Procedure for investigation of a disclosure

6.1 When a worker makes a disclosure, GLP will acknowledge its receipt, in writing, within a reasonable time.

6.2 GLP will then determine whether it believes that the disclosure is wholly without substance or merit. If GLP considers that the disclosure does not have enough merit to warrant further action, the worker will be notified in writing of the reasons for GLP's decision and advised that no further action will be taken by GLP under this policy and procedure. Considerations to be considered when making this determination may include the following:

- If GLP is satisfied that a worker does not have a reasonable belief that suspected malpractice is occurring; or
- If the matter is already the subject of legal proceedings or appropriate action by an external body; or
- If the matter is already subject to another, appropriate procedure.

6.3 When a worker makes a disclosure which has enough substance or merit warranting further action, GLP will act it deems appropriate (including action under any other applicable policy or procedure). Possible actions could include internal investigation; referral to the company's auditors; or referral to relevant external bodies such as the police, Ofsted, Health and Safety Executive or the Information Commissioner's Office.

6.4 If appropriate, any internal investigation would be conducted by a manager of GLP without any direct association with the individual to whom the disclosure relates, or by an external investigator appointed by GLP as appropriate. [Depending on the seriousness of the concern raised and the seniority of the worker making the disclosure, it would be appropriate for a senior manager or a designated officer, to investigate the concern].

6.5 Any recommendations for further action made by GLP will be addressed to the Chief Executive Officer as appropriate in the circumstances. The recipient will take all steps within their power to ensure the recommendations are implemented unless there are good reasons for not doing so.

6.6 The worker making the disclosure will be notified of the outcome of any action taken by GLP under this policy and procedure within a reasonable period of time. If the worker

is not satisfied that their concern has been appropriately addressed, they can appeal against the outcome by raising the issue with the Chief Executive Officer within ten working days.

The Chief Executive Officer will make a final decision on action to be taken and notify the worker making the disclosure. Unless the complaint is against the Chief Executive Officer and it would then be the designated member of the Senior Management. (The procedure should encourage the expeditious investigation of disclosures and can specify timelines for different stages of the procedure. However, timescales should be flexible, taking into account that different types of concerns will require varying time for investigation.

All communications with the worker making the disclosure should be in writing and sent to the worker's home address rather than through GLP's internal mail. If investigations into the concern are prolonged, GLP should keep the worker concerned updated as to the progress of the investigation and an estimated timeframe for its conclusion)

7. Safeguards for workers making a disclosure

- 7.1 A worker making a disclosure under this procedure can expect their matter to be treated confidentially by GLP and, where applicable, their name will not be disclosed to anyone implicated in the suspected wrongdoing, without their prior approval.

(For confidentiality purposes, if the worker requests to raise their concern verbally, it would be appropriate for GLP to allow the worker to do so)

- 7.2 GLP will take all reasonable steps to ensure that any report of recommendations, or other relevant documentation, produced by GLP does not identify the worker making the disclosure without their written consent, or unless GLP is legally obliged to do so, or for the purposes of seeking legal advice.
- 7.3 No formal disciplinary action will be taken against a worker on the grounds of making a disclosure made under this policy or procedure. This does not prevent GLP from bringing disciplinary action against a worker where GLP has grounds to believe that a disclosure was made maliciously or vexatiously, or where a disclosure is made outside GLP without reasonable grounds.
- 7.4 A worker will not suffer dismissal or any detrimental action or omission of any type (including informal pressure or any form of victimisation) by GLP for making a disclosure in accordance with this policy and procedure. Equally, where a worker is threatened, bullied, pressurised or victimised by a colleague for making a disclosure, disciplinary action will be taken by GLP against the colleague in question.

8. Disclosure to external bodies

- 8.1 This policy and procedure has been implemented to allow workers to raise disclosures internally within GLP. A worker has the right to make a disclosure outside of GLP where there are reasonable grounds to do so and in accordance with the law.
- 8.2 Workers may make a disclosure to an appropriate external body prescribed by the law. This list of 'prescribed' organisations and bodies can be found in information on the GOV.UK website.

- 8.3 Workers can also make disclosures on a confidential basis to a practising solicitor or barrister.
- 8.4 If a worker seeks advice outside of GLP, they must be careful not to breach any confidentiality obligations or damage GLP's reputation in so doing.

9. Accountability

- 9.1 GLP will keep a record of all concerns raised under this policy and procedure (including cases where GLP deems that there is no case to answer and therefore that no action should be taken).

10. Further assistance for workers

- 10.1 GLP will not tolerate any harassment or victimisation of workers who make disclosures. If, at any stage of this procedure a worker feels that they are being subject to informal pressures, bullying or harassment due to making a disclosure, they should raise this matter, in writing, to Chief Executive Officer
- 10.2 A worker making a disclosure may want to confidentially request counselling or other support from GLP's occupational health service. Any such request for counselling or support services should be addressed to Human Department. Such a request would be made in confidence.
- 10.3 If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcome of the investigation, GLP recognises the lawful rights of its staff and ex-employees to make disclosures to prescribed persons (such as the Health and Safety Executive, the Audit Commission, or the utility regulators), or, where justified, elsewhere in a manner deemed to have not broken GDPR and Data Protection Act regulations
- 10.3 Workers can also contact the charity Public Concern at Work for confidential advice on whistleblowing issues.

Contact details are as follows:

3rd Floor, Bank Chambers
6 - 10 Borough High Street
London SE1 9QQ
Whistleblowing Advice Line: 020 7404 6609 <http://www.pcaw.org.uk>