

Whistleblowing Policy (UK)

gentrack™

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1. Purpose

We are committed to acting with honesty, integrity and openness, and to creating a working environment where concerns about suspected wrongdoing, risk or malpractice can be raised safely.

This policy explains how to raise a whistleblowing concern, how concerns will be handled, and the support and protection available to those who speak up. We encourage you to raise concerns as early as possible so that we can respond promptly, fairly and sensitively, and take appropriate action.

You do not need to prove that wrongdoing has occurred before raising a concern – see Section 4 for what counts as a reasonable belief. You are protected from retaliation and detrimental treatment for raising a concern on this basis, as explained in Section 10.

Everyone covered by this policy is expected to behave in line with this policy and Gentrack values.

This policy does not form part of your contract of employment. It will be reviewed regularly, and whenever there are relevant legal or organisational changes, to ensure it remains effective and up to date. Any changes will be communicated to our workforce.

2. Scope

This policy applies to all UK employees, workers, contractors, agency workers, consultants and former employees of Gentrack. Throughout this policy, 'you' refers to everyone covered by its scope.

Concerns relating solely to your own employment or treatment at work should normally be raised under our Grievance Policy. However, a personal concern may also involve wrongdoing that affects others or is in the public interest. In these circumstances, both policies may apply.

Section 5 explains the difference between a grievance and whistleblowing in more detail, including what to do if you are unsure which route applies.

3. Definitions

Whistleblowing

Whistleblowing means sharing information about wrongdoing that you reasonably believe has happened, is happening or is likely to happen, and reasonably believe it is in the public interest to report.

A concern may affect you personally and still amount to whistleblowing.

Protected disclosure

A 'protected disclosure' is a qualifying disclosure (explained in Section 4) made in accordance with the legal requirements of the Employment Rights Act 1996, as amended, including by the Public Interest Disclosure Act 1998 and the Employment Rights Act 2025.

The law protects workers from detriment because they have made a protected disclosure. Detriment means adverse treatment, which may include bullying, exclusion or being denied opportunities. Employees are also protected from dismissal because they have made a protected disclosure.

Worker

For whistleblowing purposes, 'worker' has a wider legal meaning than in some other areas of employment law. It includes employees, agency workers and certain other individuals, depending on their working arrangements and the applicable legal criteria.

The scope of this policy is broader than statutory whistleblowing protection. Gentrack's commitment to supporting those who raise concerns and preventing retaliation applies to everyone covered by this policy, including those who may not qualify for statutory protection.

4. Qualifying Disclosures

A 'qualifying disclosure' means sharing information that you reasonably believe is in the public interest and tends to show that one or more of the following has happened, is happening or is likely to happen:

- a criminal offence;
- a failure to comply with a legal obligation;
- a miscarriage of justice;
- danger to the health and safety of any individual;
- sexual harassment, meaning unwanted conduct of a sexual nature as defined in the Equality Act 2010;
- damage to the environment; or
- the deliberate concealment of information relating to any of the above.

'In the public interest' generally means that the concern affects others, such as colleagues, customers or the wider public, rather than relating solely to your personal circumstances. A concern can affect you personally and still be in the public interest.

You do not need to be certain that wrongdoing has occurred or have all the evidence before raising a concern. A reasonable belief is enough to speak up.

Reports of sexual harassment may also qualify for whistleblowing protection where the legal requirements are met. These concerns can be raised under this policy or our Sexual Harassment Policy.

5. Whistleblowing and Personal Grievances

Both whistleblowing concerns and personal grievances matter to us. The appropriate procedure depends on the nature of the concern.

Whistleblowing involves sharing information about wrongdoing that you reasonably believe is in the public interest, as explained in the previous section. You may be personally affected by the wrongdoing and still raise a whistleblowing concern.

A personal grievance or complaint usually relates to your own employment or treatment at work, without a wider public interest concern. Examples may include a disagreement about your performance management, working arrangements or a disciplinary decision.

We will consider the information you provide carefully before deciding which procedure applies. A concern will not be excluded from this policy simply because it affects you personally or is raised as a grievance.

Where a concern relates solely to a personal matter, we will explain why it is more appropriate to address it under our Grievance Policy or another relevant procedure, including any applicable appeal process. Where a concern involves both a personal grievance and whistleblowing, both procedures may apply.

If you are unsure which route to use, PX can provide support and guidance. You do not need to identify the correct procedure before raising a concern.

6. Responsibilities

These responsibilities apply to everyone covered by this policy.

6.1. Worker Responsibilities

We encourage you to speak up if you reasonably believe wrongdoing has happened, is happening or is likely to happen. We recognise that raising a concern can feel difficult, and we will support you in doing so.

When raising a concern, we ask that you:

- raise it as early as reasonably possible, using the reporting routes set out in this policy;
- provide information honestly and explain the reasons for your concern;
- share any relevant details, supporting evidence or potential witnesses, where available; and
- cooperate with any enquiries or investigation, as far as you reasonably can.

6.2. Manager Responsibilities

Managers and anyone receiving a concern under this policy are expected to:

- listen carefully and treat the concern seriously, fairly and sensitively;
- protect confidentiality as far as possible, sharing information only where appropriate and necessary;
- acknowledge the concern promptly, explain the next steps and outline the support available;
- escalate the concern to PX without delay and ensure it is referred to an appropriate person who is not implicated in the concern;

- take steps to prevent retaliation or detrimental treatment and act promptly if any concerns about this arise; and
- seek guidance from PX or Legal where needed.

A concern must not be dismissed simply because it was raised informally, in a particular format or with someone other than the designated contact. The person receiving it should help ensure it reaches the appropriate contact and is considered under the relevant procedure, following the reporting routes set out in Section 7.

7. How to Raise a Concern

7.1. Reporting internally

We encourage you to raise concerns with your line manager where you feel comfortable doing so. If the concern relates to your line manager, or you would prefer to speak to someone else, you may contact:

- a more senior manager;
- a member of the People Experience (PX) team; or
- a Director or member of the Executive team.

You may use any of these routes without speaking to your line manager first. If your concern involves someone in PX or senior leadership, you should choose another contact who is not involved in the matter.

The PX Director has overall responsibility for this policy and is the appropriate contact if you are unable to identify anyone else suitable, including where a concern involves PX or senior leadership more broadly.

Concerns can be raised verbally or in writing, including by email. You do not need to use a specific form. We may ask you to confirm a written record of a verbal report to ensure we have understood it accurately, but you do not need to provide written confirmation before we consider your concern.

Where possible, please share:

- the nature of your concern and why you are concerned;
- the background and any relevant dates;
- any supporting information or potential witnesses.

You may raise a concern anonymously. We will take anonymous concerns seriously and assess the information available. However, anonymity may make it harder to ask follow-up questions, investigate fully or provide updates.

If you feel comfortable sharing your identity, this can help us understand your concern and keep you informed. We will take appropriate steps to protect your identity and handle information confidentially, as explained in Section 9.

7.2. Reporting externally

We encourage you to raise concerns internally so that we can investigate and take appropriate action.

You do not have to report internally before making a disclosure to an appropriate prescribed person or body. There is not necessarily a prescribed person for every type of concern. The appropriate body, if any, will depend on the subject matter of the concern and whether it falls within that body's remit. The current GOV.UK list of prescribed persons and bodies explains the matters that can be reported to each body.

Legal protection for external disclosures depends on meeting the applicable legal requirements. Different conditions apply depending on who receives the disclosure, and disclosures to the media are protected only in limited circumstances.

If you are unsure whether your concern amounts to whistleblowing or would like independent and confidential advice about your options, you can contact Acas or the Independent Whistleblowing Charity Protect. Nothing in this policy prevents you from making a protected disclosure or reporting suspected criminal conduct to the police or another appropriate authority.

8. Investigation Procedure

8.1. Acknowledging a disclosure

We will acknowledge your concern as soon as reasonably practicable, normally within 5 working days. We will thank you for coming forward, explain the next steps and outline the support available.

Where a concern indicates an immediate risk to health and safety or other serious harm, we will consider whether urgent protective action is needed.

8.2. Investigation meeting

We will normally arrange a meeting with you to discuss your concern and understand the information available, including any supporting evidence or potential witnesses.

Under this policy, you may be accompanied at any investigation or formal meetings by a trade union representative or workplace colleague.

We will appoint an investigator with appropriate experience who is not involved in the concern and has no conflict of interest. Where appropriate, this may be an external investigator. The investigation will be fair, objective and proportionate to the concern, and may include reviewing relevant documents and speaking with witnesses.

Where necessary, we will consider interim measures to protect those involved and prevent further harm. These measures will not be treated as a finding of wrongdoing or a disciplinary sanction.

8.3. Timescales

We will investigate concerns as promptly as reasonably practicable. We aim to complete investigations within 20 working days of the investigation meeting, although the time required will depend on the nature and complexity of the concern.

We will keep you informed of progress. If more time is needed, we will explain the reasons and provide a revised expected completion date. Urgent risks will be addressed without waiting for the investigation to conclude.

8.4. Outcome and feedback

Once the investigation is complete, we will confirm the outcome to you in writing, where we have your contact details. We will share as much information as reasonably possible, while respecting confidentiality and the rights of others involved.

No action will be taken against you simply because your concern is not upheld or is found to be mistaken. However, deliberately providing information that you know to be false may be addressed under our Disciplinary Policy. A concern that is mistaken, unsubstantiated or not upheld will not, by itself, amount to misconduct. See Section 10 for how we protect you against retaliation.

If you are not satisfied with how your concern was handled or the outcome, you may request a review by contacting PX or a more senior manager within 7 calendar days of receiving the outcome. Wherever reasonably practicable, the review will be carried out by someone who was not involved in the original investigation and is not implicated in the concern. You may also report externally as explained in Section 7.2.

Where a concern is substantiated, we will take appropriate action. This may include disciplinary action up to and including dismissal, a referral to an appropriate regulator or the police, changes to policies or processes, or additional training. Any disciplinary action will follow our Disciplinary Policy.

9. Confidentiality and Anonymity

We recognise that you may be concerned about being identified when raising a concern. We will handle disclosures sensitively and confidentially, sharing information only where appropriate and necessary.

If you ask us to keep your identity confidential, we will make every reasonable effort to do so. However, we cannot guarantee absolute confidentiality. Your identity may need to be disclosed where required by law or where necessary to investigate or address the concern. Wherever practicable, we will discuss this with you beforehand, explain what information needs to be shared and with whom, and consider any support or protective measures needed.

You may also raise a concern anonymously. We will take anonymous concerns seriously and consider the information available. However, anonymity may limit our ability to ask further questions, investigate fully or provide feedback. Please include as much relevant detail as you feel able to share.

10. Protection Against Detrimental Treatment

We want you to feel safe and supported in raising concerns. We will not tolerate retaliation, harassment or detrimental treatment against anyone who raises a concern based on a reasonable belief, even if it is later found to be mistaken. This commitment also applies to anyone who supports someone in raising a concern or takes part in an investigation.

Detrimental treatment may include bullying, exclusion, unjustified criticism, denial of opportunities or dismissal because someone has spoken up or supported an investigation.

Anyone found to have subjected another person to such treatment may face disciplinary action, up to and including dismissal, in accordance with our Disciplinary Policy.

If you believe you have experienced detrimental treatment, please tell PX or a senior manager as soon as possible. If your concern involves that person, you may contact someone else who is not involved. We will take your concern seriously, consider any immediate support or protective measures needed, and take appropriate action.

You do not need a minimum period of service to qualify for statutory whistleblowing protection. Protection can also apply after you have left Gentrack.

11. Record Keeping

We will keep a written record of concerns raised under this policy, including relevant enquiries, investigations, outcomes, action taken and feedback provided.

Records will be held securely, accessed only by those who need them for appropriate purposes, and retained in accordance with our data protection obligations and retention requirements.

These records help us handle concerns fairly and consistently, identify recurring issues and improve our processes.

12. Employee Assistance Programme

Raising or being involved in a whistleblowing concern can be stressful. We would like to remind you that further support is available by contacting our Employee Assistance Programme (EAP), a confidential 24-hour telephone counselling service, which can be accessed through Health Assured.

The Wisdom app is also available via the EAP, offering a live chat function and additional wellbeing resources.

Your access code is: MHA176618

More details of this service and additional support are available from the PX team.

13. Related Policies

- Grievance Policy
- Disciplinary Policy

- Anti-Harassment and Bullying Policy
- Sexual Harassment Policy
- Code of Conduct
- Data Protection Policy

14. References

- Equality Act 2010 (EqA), as amended
- Employment Rights Act 1996
- Public Interest Disclosure Act 1998
- Employment Rights Act 2025