

"WHISTLEBLOWING" POLICY (Making a Disclosure in the Public Interest)

1. Introduction

1.1 Assessment Services Ltd is committed to the highest standards of openness, integrity, accountability, and transparency.

1.2 An essential aspect of accountability is providing a clear mechanism that enables individuals to raise concerns about malpractice or wrongdoing in a responsible, confidential, and effective manner.

1.3 While all Assessors, employees, and contractors have an obligation to respect confidentiality regarding Assessment Services Ltd's business affairs, this policy recognises that there are circumstances where reporting concerns is in the public interest.

1.4 The **Public Interest Disclosure Act 1998** offers legal protection to those who disclose certain serious concerns, ensuring individuals can report wrongdoing without fear of reprisal.

1.5 This policy encourages concerns to be raised internally, using the appropriate process, rather than aired publicly or outside the organisation.

2. Scope of the Policy

2.1 This policy applies to all employees, Assessors, contractors, and anyone working on behalf of Assessment Services Ltd. It enables individuals to raise concerns about suspected:

- Financial malpractice, fraud, or impropriety
- Breaches of legal obligations or statutory duties
- Health & Safety dangers or environmental harm
- Criminal activities
- Unethical conduct or improper behaviour
- Attempts to conceal any of the above

2.2 Matters of personal grievance or dissatisfaction that are addressed under other processes (e.g., complaints, disciplinary or harassment procedures) are outside the scope of this policy.

3. Safeguards for Whistleblowers

i. Protection

This policy protects individuals who:

- Raise concerns in good faith
- Reasonably believe their concerns indicate malpractice or wrongdoing
- Raise concerns via the appropriate channels outlined in this policy

No protection is offered to those who raise malicious, unfounded, or vexatious allegations. Such conduct may result in disciplinary action or legal consequences.

ii. Confidentiality

All disclosures will be treated confidentially. While every effort will be made to protect the identity of individuals raising concerns, disclosure of identity may be necessary to enable a full investigation or to comply with legal obligations.

iii. Anonymous Allegations

Anonymous disclosures will be considered, but may be harder to investigate. The following factors will influence whether an anonymous concern is pursued:

- Seriousness of the issue
- Credibility and clarity of the information provided
- Likelihood of corroborating evidence from other sources

iv. Unsubstantiated Allegations

If a concern is raised in good faith but not substantiated after investigation, no action will be taken against the individual. Malicious or knowingly false allegations will be treated seriously and may lead to disciplinary action.

4. Reporting Procedure

4.1 Concerns should be reported promptly to:

- **Managing Director** for most concerns
- If the concern involves the Managing Director, report to the **Chief Executive**
- If the concern involves the Chief Executive, report to the **Chairman**

4.2 Individuals may bypass line management and contact the Chairman directly if they believe management cannot appropriately handle the concern.

4.3 Where criminal activity is suspected, the police may be informed.

5. Investigation Process

5.1 The designated investigating officer will:

- Obtain full details of the concern, ensuring confidentiality is maintained
- Inform the person(s) subject to the complaint as soon as appropriate, advising of their right to be accompanied in any meetings
- Consider involvement of external bodies (e.g., auditors, police)
- Conduct a thorough investigation, with support from relevant individuals
- Produce a written report detailing findings and recommendations
- Submit the report to the Chief Executive or Chairman as appropriate

5.2 If the concern is substantiated, disciplinary or other appropriate action will be taken.

5.3 The complainant will be kept informed of progress and the outcome, subject to legal and confidentiality constraints.

6. Timescales

6.1 Investigations will be conducted as quickly as possible, balancing thoroughness with prompt action. Written acknowledgements will be provided to complainants, along with regular progress updates.

7. Escalation and External Disclosure

7.1 If the complainant believes their concern is not being properly addressed, they may escalate the matter to:

- The Managing Director
- Impartiality Board

7.2 If internal processes are exhausted and the concern remains unresolved, individuals may make lawful disclosures to prescribed external bodies (e.g., Health and Safety Executive, regulators) in line with the Public Interest Disclosure Act.

Last Updated: 7th July 2025

Next Review: July 2026