

1. Policy statement

At Uniserv Enterprises Ltd, we are committed to maintaining the highest standards of ethics, transparency, and compliance in all aspects of our operations. This whistleblowing policy empowers our employees, partners, and stakeholders to speak up about any behaviour that is illegal, unethical, or harmful without fear of retaliation.

- 1.1 This policy aims to enable and encourage staff to raise concerns within Uniserv Enterprises Ltd and that they are investigated in a timely and effective manner. It recognises a worker's legal rights to make a protected disclosure to certain prescribed persons or bodies under the Public Interest Disclosure Act 1998 and any subsequent legislation, as incorporated into the Employment Rights Act 1996¹.
- 1.2 Uniserv Enterprises Ltd is committed to creating a safe, open and transparent workplace culture, where employees are encouraged to raise concerns at the earliest opportunity. Uniserv Enterprises Ltd recognises that employees are often the first to realise that there may be something seriously wrong within an organisation.
- 1.3 It is important to Uniserv Enterprises Ltd that any fraud, misconduct or wrongdoing by workers or officers of the organisation is reported and properly dealt with. Uniserv Enterprises Ltd is committed to tackle malpractice and wrongdoing. Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. If any cases of wrongdoing are upheld they will be seriously dealt with.
- 1.4 Uniserv Enterprises Ltd encourages staff to use internal mechanisms for reporting malpractice or illegal acts or omissions by employees or ex-employees. Employees will be listened to and serious concerns will be investigated.
- 1.5 Uniserv Enterprises Ltd will provide regular refresher training to all managers enabling them to deal with concerns that are raised and is committed to treating all disclosures consistently and fairly.
- 1.6 Uniserv Enterprises Ltd will ensure that all new employees, supervisors and managers will receive induction on the policy and will provide refresher training to all members of staff so that they are aware of whistleblowing law and know how to use this policy.
- 1.7 Adequate resources will be made available to fulfil the aims of this policy. The policy will be widely promoted, and copies will be freely available and displayed in Uniserv Enterprises Ltd's offices and through the staff intranet [amend as appropriate to your workplace].
- 1.8 This policy allows staff to take the matter further if they are dissatisfied with the management response and aims to reassure staff that they will be protected from harassment or victimisation from co-workers or from Uniserv Enterprises Ltd for raising concerns.

2. Definitions and scope

- 2.1 This policy applies to all staff including temporary, casual and agency staff, work experience, trainees and apprentices. Other individuals who work or have worked within the organisation, such as former staff, volunteers, the self-employed and contractors, are also encouraged to use it.

2.2 For the purpose of this policy, Uniserv Enterprises Ltd recognises that whistleblowing is the passing on of information about wrongdoing at work. The whistleblower must reasonably believe that they are acting in the public interest.

2.3 The statutory categories for wrongdoing are:

- a criminal offence (such as insurance fraud or illegal tax evasion)
- a breach of any legal obligation
- a miscarriage of justice
- endangering an individual's health and safety
- damage to the environment
- deliberate concealment of information about any of the above.

2.4 Examples of wrongdoing might include (but are not restricted to) :

- unsafe working conditions
- lack of, or poor, response to a reported safety incident
- inadequate induction or training for staff
- suspicions of fraud
- a bullying culture (across a team or organisation rather than individual instances of bullying).

2.5 It is not necessary for the member of staff to have proof that wrongdoing is being, has been, or is likely to be committed. A reasonable belief is sufficient to disclose the concern. The member of staff has no responsibility for investigating the wrongdoing. It is the organisation's responsibility to ensure that an investigation takes place.

2.6 A member of staff who makes such a protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimised, because they have made a disclosure.

2.7 Uniserv Enterprises Ltd recognises that any so-called 'gagging' or confidentiality clauses in settlement agreements or non-disclosure agreements with individuals do not prevent members of staff from making disclosures in the public interest and are void in such circumstances.

2.8 If the wrongdoing that the staff member wants to disclose is not included in the list above, advice may be sought from the designated officers (see section 4 below) or from a trade union representative on the use of the appropriate policy.

2.9 This policy is not for staff with concerns about their employment that affect only them – that type of concern is better suited to the grievance policy or dignity at work policy which can be found [provide links].

2.10 Uniserv Enterprises Ltd recognises employees may wish to seek advice and be represented by their trade union(s) officers when using the provisions in this policy.

2.11 This policy is supported by and developed with the trade unions representing the employees.

2.12 This policy will be reviewed annually from date of issue by the designated officer/s (see section 4 below) in conjunction with the senior management team and trade union representatives. Where review is necessary due to legislative change, this will happen immediately.

3 Roles and Responsibilities

3.1 The senior management team [and/or Board or Trustees etc as appropriate] are responsible and accountable for this Whistleblowing Policy and Procedure. They will:

- demonstrate commitment to developing an open culture within the organisation, through actions and strategy
- receive and review annual reports on whistleblowing activity
- appoint designated officer/s.

3.2 All staff have a duty to report wrongdoing (whistleblow) under the circumstances set out in section 2 of this policy.

3.3 Line managers are responsible for:

- ensuring all staff are aware of this policy and procedure and their responsibilities
- investigating issues raised promptly and thoroughly
- fostering an open culture within their teams
- ensuring any whistleblower is not subject to detriment
- escalating issues and engaging the support of designated officer/s where required.

3.4 Designated officer/s (see below) have lead responsibility for the whistleblowing procedure and for dealing with issues raised. They will:

- oversee and review the whistleblowing policy and procedure
- provide advice and support to managers and employees
- ensure learning from whistleblowing cases is fed back to the wider organisation
- ensure managers are trained in dealing with issues
- investigate issues raised with them directly promptly and thoroughly
- inform all reported disclosures to the senior management team [or it may be more appropriate for this information to go to the chief officer or equivalent in the organisation] and the actions being taken
- ensure the process is monitored and improved where required
- provide reports on whistleblowing activity on an annual basis to the senior management team.

3.5 Trade union representatives will

- support employees through the procedure
- help ensure all staff are aware of this policy and procedure and their responsibilities
- be consulted on the review, monitoring and improvement of the policy and procedure where required.

4 Designated officers

4.1 The following people have been nominated and agreed by Uniserv Enterprises Ltd as designated officers for concerns under this procedure.

Mr Surrinder Bassan – Mobile 07802 305 228 Email: sbassan@uniserv.co.uk

Mrs Alina Bassan – Mobile 07963 265 023 Email abassan@uniserv.co.uk.

4.2 These designated officers will act as an independent and impartial source of advice to staff at any stage of raising a concern, with access to anyone in the organisation.

4.3 All these people have been given special responsibility and training in dealing with whistleblowing concerns and will give you information about where you can go for more support. They will:

- treat the concern confidentially unless otherwise agreed
- ensure the staff member receives timely support to progress their concern
- escalate to senior management any indications that the staff member is being subjected to detriment for raising their concern
- remind the organisation of the need to give the staff member timely feedback on how their concern is being dealt with
- ensure the staff member has access to personal support as it is recognised that raising such a concern may be stressful.

5 How to raise a concern

5.1 In many circumstances, the easiest way a member of staff can get their concern resolved will be to raise it formally or informally with their line manager who should report it to the designated officer.

5.2 If this is not appropriate as the concern relates to the line manager, or if the member of staff does not feel able to raise it with them or if raising it with their line manager does not resolve matters, the member of staff can approach a designated officer (see above) directly. The designated officer will then confirm how the matter will be investigated. It is not appropriate for the member of staff to attempt to undertake their own investigation.

5.3 Any member of staff who wants to raise a concern that is potentially of public interest, is encouraged to get legal advice where appropriate such as through their trade union or through the charity Protect (see section 9. 'More information and support' below). [You may want to expand this list of sources of legal advice to perhaps include the Employee Assistance Programme if it is available and provides the right type of legal advice.]

5.4 If, for any reason, the member of staff does not feel comfortable raising their concern internally, they can raise concerns externally with 'prescribed bodies' (see section 8 below) if they feel this is necessary and in the public interest.

5.5 Concerns should be raised in writing (including email). The letter should set out the background and history of the concerns, giving names, dates and places where possible, and the reason why the member of staff is making the disclosure. If the individual does not feel able to make the disclosure in writing, an interview will be arranged.

5.6 When any meetings are arranged with an individual who is making or has made a protected disclosure, they have a right to be accompanied by a trade union representative. The meeting can be off site if requested.

- 5.7 The employee raising concerns does not have to prove the allegation but they must demonstrate that there are sufficient grounds for concern.
- 5.8 If the member of staff wants to raise the matter in confidence, they should please say at the outset so that appropriate arrangements can be made.
- 5.9 It is best to raise a concern openly, because that makes it easier for Uniserv Enterprises Ltd to follow it up. Uniserv Enterprises Ltd will not disclose the whistleblower's identity without their consent unless a disclosure of identity is needed due to cross examination of the staff member as a witness to any subsequent procedure or there are legal reasons that require them to disclose their identity. This might be, for example, where their information is about a child or vulnerable adult who is at risk, or where there is a possible criminal offence. If this is the case, Uniserv Enterprises Ltd may have to tell the police or another official body, or if required to do so by a court. Uniserv Enterprises Ltd will let the individual know if it has to do this and that this will identify them to another body. Uniserv Enterprises Ltd will maintain confidentiality as far as is possible.
- 5.10 Staff may, if they wish, disclose information anonymously. However, it should be noted that in such circumstances, Uniserv Enterprises Ltd will not be able to contact staff to discuss their concern or ask them for further information, nor will they normally be able to give any feedback about any action it takes, although anonymous whistleblowers may seek feedback through a telephone appointment or by using an anonymised email address.

6 How Uniserv Enterprises Ltd will respond

- 6.1 Any concern raised under this policy will be investigated thoroughly, promptly and confidentially.
- 6.2 Any approach to line managers and designated officers will be treated with the strictest confidence and the member of staff's identity will not be disclosed without their prior consent. All members of staff will be treated with respect at all times and the person raising the concern will be thanked.
- 6.3 There may be a meeting with the member of staff raising the concern to ensure Uniserv Enterprises Ltd understands exactly the particular worry.
- 6.4 When any meetings are arranged with an employee who has made a protected disclosure, they have a right to be accompanied by a trade union representative. The meeting can be off site if requested.
- 6.5 When an individual makes a disclosure, the organisation will process any personal data collected as part of the investigation in line with Uniserv Enterprises Ltd's data protection policy which can be found [\[provide link\]](#) ensuring the data is stored securely and only accessed by those individuals essential for dealing with the disclosure.
- 6.6 Within three working days of a concern being raised, the line manager or designated officer who received the disclosure will write to the member of staff setting out the following:
- Acknowledgement that the concern has been received, the date it has been received, whether the person who raised the concern has requested confidentiality, and a summary of the concern

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- Indicating how the matter will be dealt with and by whom and how they can be contacted
- Telling the member of staff who they can contact for advice and to answer queries about the process
- Telling the member of staff when an investigation has or is to be started and if further assistance will be needed from them.

6.7 The member of staff who raises the concern will be told how long to expect the investigation to take and will be kept up to date with its progress. Investigations should be undertaken by Uniserv Enterprises Ltd as quickly as possible to ensure that any wrongdoing is dealt with as soon as possible.

6.8 The matters raised may be investigated internally. Where it has not been possible to resolve the matter quickly (usually within a few days) with the line manager, someone suitably independent (such as a designated officer) and properly trained will carry out an investigation.

6.9 The investigation will be objective and evidence-based, and will produce a report that focuses on identifying and rectifying any issues, and learning lessons to prevent problems recurring. The investigator may decide that the concern would be better looked at under another process, such as the grievance procedure or dignity at work procedure. If so, this will be discussed

6.10 In the event that misconduct is discovered as a result of any investigation under this policy, the disciplinary policy and procedure will be invoked in addition to any external measures.

6.11 On conclusion of any investigation, the member of staff will be told the outcome of the investigation and what Uniserv Enterprises Ltd has done, or proposes to do, about it. Wherever possible, Uniserv Enterprises Ltd will share the full investigation report with the member of staff who raised the concern (while respecting the confidentiality of others). If no action is to be taken, the reason for this will be explained.

6.12 If an individual is not satisfied with the response received and any subsequent action taken, they should put their concerns in writing to [complete as applicable to your organisation. This should be the most senior person within the organisation such as the Chair of the board or trustees] who will arrange any further investigation as they think appropriate. [Complete as applicable to your organisation – it will be the most senior person within the organisation] will send a written response to the individual concerned.

6.13 More serious disclosures may be referred to an external prescribed person or body, and/or the police, and may form the subject of an independent inquiry.

6.14 In the event of an inquiry, where possible the trade union representatives will be consulted on the drawing up of terms of reference for any inquiry panel, as well as being involved in the implementation of any inquiry recommendations.

6.15 Uniserv Enterprises Ltd will keep a record of all disclosures made under this policy and procedure in order to monitor the effectiveness of the policy, including any action taken and any confidentiality requests the discloser may have made. The record must be in line with all data

protection requirements and kept for no longer than is necessary, with access strictly limited to only necessary staff.

7 Harassment and victimisation

- 7.1 Uniserv Enterprises Ltd understands that raising a concern can be difficult for staff, especially if they fear reprisal from those responsible for the malpractice.
- 7.2 Uniserv Enterprises Ltd will not tolerate harassment and victimisation of anyone raising a concern, and there should be no impact on the continued employment and opportunities for future promotion or training of anyone raising a concern. Any such behaviour is a serious breach of our values as an organisation and, if upheld following investigation, could result in disciplinary action potentially leading to dismissal.
- 7.3 Nor will Uniserv Enterprises Ltd tolerate any attempt to bully anyone into not raising any such concern. Any such behaviour is a breach of our values as an organisation and, if upheld following investigation, could result in disciplinary action potentially leading to dismissal.
- 7.4 If a member of staff thinks they have or may suffer detrimental treatment as a result of raising a concern, they should contact [list designated officers, Whistleblowing Champions or HR as appropriate with contact details.]
- 7.5 This policy encourages members of staff to put their name to their concerns. Concerns expressed anonymously are harder to follow up and have an effective outcome.
- 7.6 If a member of staff makes an allegation in good faith, but the allegation is not confirmed by the investigation, no action will be taken against that member of staff. They will not be at risk of losing their job or suffering any form of reprisal as a result. Provided the member of staff is acting honestly, it does not matter if they are mistaken or if there is an innocent explanation for their concerns.

8 Reporting a concern to an external body

This policy is intended to provide a route by which members of staff can raise concerns internally. However, if an employee is unhappy with the outcome of an investigation or if, for any reason they do not feel comfortable raising their concern internally, they are free to take the matter outside of the organisation to a prescribed person or body or to their Member of Parliament (MP).

- 8.1 The full list of prescribed persons and bodies can be found on the UK government website at www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies-2/whistleblowing-list-of-prescribed-people-and-bodies. They include

- HM Revenue & Customs
- the Comptroller and Auditor General
- the Director of the Serious Fraud Office
- the Charity Commission for England and Wales
- the Information Commissioner
- the Equality and Human Rights Commission
- the Health and Safety Executive
- the Care Quality Commission
- the Environment Agency.

9 More information and support

9.1 Protect is the UK's whistleblowing charity that aims to stop harm by encouraging safe whistleblowing. They provide a legal advice service by offering free expert and confidential advice on how best to raise a concern and protection as whistleblower. <https://protect-advice.org.uk>, Protect Advice Line: 020 3117 2520 or [webform https://protect.tfaforms.net/f/Contact-the-Advice-Line](https://protect.tfaforms.net/f/Contact-the-Advice-Line)

9.2 UK government advice on 'Whistleblowing for employees' www.gov.uk/whistleblowing

9.2 Acas guidance on 'Whistleblowing at work' www.acas.org.uk/whistleblowing-at-work

10 Signatories

This agreement comes into force on:

Date: 20th October 2025

This agreement will be reviewed on:

Date: 20TH October 2026

SIGNED:  for Uniserv Enterprises Ltd

DATE: 20th October 2025