



BLCP0010

Whistleblowing Policy

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Version history

Version	Issue date	Author/editor	Responsible Officer Approval Date	Summary of changes
1.0	January 2021	Emily Weir, HR Business Partner		First issue.
2.0	November 2021	Michelle Kemp Administrator		Entered into Document Control System.
3.0	03/01/2025	Caroline Moss, Head of Business Services & Company Secretary	17/01/2025	Entered onto new template and existing text realigned to new sections. Audit & Risk Committee name updated throughout. Corporate Business Manager role name updated to Head of Business Services throughout. Section 1.3 and 1.4 added to policy. Section 3 Key Principles added to policy. Point 8.6 added at request of ARFCC. Section 13, 14 & 15 added to policy.
3.1	20.10.2025	Caroline Moss, Head of Business Services	20.10.2025	Reference to previous HR system Hi-bob removed and adjusted to the Document Management System (DMS).

Version	Issue date	Author/editor	Responsible Officer Approval Date	Summary of changes
				Training and Communication sections updated.

Related documents

Document Number	Document Name	File Location
BLCP0036	Bullying and Harassment Policy	MS Teams - DMS
BLCP0038	Grievance Policy	MS Teams - DMS

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1. Purpose

- 1.1. This policy aims to support BlueLight Commercial in acting in accordance with the Bribery Act 2010. It also aims to maintain the highest possible standards of business practice and advise individuals of BlueLight Commercial's 'zero-tolerance' to bribery.
- 1.2. BlueLight Commercial is committed to ethical standards of business conduct and adopts a zero-tolerance approach to bribery and corruption. BlueLight Commercial will uphold all laws relevant to countering bribery and corruption, including but not limited to, the Bribery Act 2010.
- 1.3. All employees are encouraged to raise genuine concerns about possible improprieties in matters of financial reporting and other malpractices at the earliest opportunity, and in an appropriate way.
- 1.4. This policy is designed to:
 - 1.4.1. support our values;
 - 1.4.2. ensure employees can raise concerns without fear of suffering retribution; and
 - 1.4.3. provide a transparent and confidential process for dealing with concerns.

2. Scope

- 2.1. This policy applies to:
 - 2.1.1. All employees of BlueLight Commercial
 - 2.1.2. Secondees to BlueLight Commercial.
 - 2.1.3. Volunteers in BlueLight Commercial.
 - 2.1.4. People working within BlueLight Commercial in any third-party capacity, including but not limited to consultants, contractors and third-party agency staff.
 - 2.1.5. BlueLight Commercial Board members.

3. Key Principles

- 3.1. The key principles of this this policy are:
 - 3.1.1. All concerns raised will be treated fairly and properly.
 - 3.1.2. BlueLight Commercial will not tolerate the harassment or victimisation of anyone raising a genuine concern.
 - 3.1.3. Any individual making a disclosure will retain their anonymity unless they agree otherwise.

- 3.1.4. BlueLight Commercial will ensure that any individual raising a concern is aware of who is handling the matter.
- 3.1.5. BlueLight Commercial will ensure no one will be at risk of suffering some form of retribution as a result of raising a concern even if they are mistaken. This assurance is however not extended to someone who maliciously raises a matter they know to be untrue.

4. Understanding What Whistleblowing Is

- 4.1. If you have a genuine and reasonable suspicion about serious wrongdoing or malpractice within BlueLight Commercial, such as negligence, illegality or improper conduct and believe it is in the public interest to disclose it, you can raise your concerns and be legally protected under The Public Interest Disclosure Act 1998 (“whistleblowing”). A concern is in the public interest if it creates a potential risk and/or danger to colleagues, suppliers, the wider public, BlueLight Commercial or its reputation.
- 4.2. To be legally protected, you must also make the disclosure to an appropriate person and ensure your concern relates to one of the following:
 - 4.2.1. A criminal offence, such as bribery, fraud or corruption
 - 4.2.2. The breach of a legal obligation
 - 4.2.3. A miscarriage of justice
 - 4.2.4. Any act which causes risk to health and safety
 - 4.2.5. A risk of and/or actual damage to the environment
 - 4.2.6. The deliberate attempt to cover up and/or conceal the wrongdoing in any of the above situations
- 4.3. You can raise your concerns about wrongdoing at any time; whether the incident has already happened, is currently happening or is likely to happen in the future. You do not need to provide proof to support your allegation, although you should reasonably believe that the disclosure is in the public interest and will need to provide sufficient supporting information to help BlueLight Commercial to understand what led to your concern.

5. Understand What Whistleblowing Is Not

- 5.1. You should understand that whistleblowing is not the same as a personal complaint, dispute or problem you have with BlueLight Commercial. If you are unhappy about something that is affecting you at work, such as how you are being treated by others or your employment conditions, you should refer to the BlueLight Commercial Grievance Policy.

- 5.2. If your grievance relates to a complaint of bullying, harassment or victimisation, you are encouraged to read the Bullying and Harassment Policy.
- 5.3. It is also important to remember that disclosures made maliciously, falsely or for personal gain are inappropriate and may lead to disciplinary action.

6. Before Raising a Concern

- 6.1. If you think there may be acts of wrongdoing taking place within BlueLight Commercial, but you are unsure about raising a concern, you can contact the independent whistleblowing charity 'Public Concern at Work', in complete confidence for free and impartial advice. <http://www.pcaw.org.uk/about/contact-us>

7. Internal Reporting

- 7.1. If you are concerned that there is a negligent, improper or illegal activity going on within BlueLight Commercial you should report this without delay. You should contact your line manager in the first instance (if appropriate). If your concern relates to your line manager or you don't feel comfortable raising with them then you can contact the Whistleblowing Officer.

8. Contacts

- 8.1.

Whistleblowing Officer	Whistleblowing@bluelight.police.uk This inbox is monitored by the Head of Business Services and Legal Commercial Services Director. If your concern relates to the Head of Business Services or the Legal Commercial Services Director, please direct your concern directly to the CEO.
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- 8.2. If your concern relates to BlueLight Commercial's Chief Executive Officer and you don't feel comfortable raising the concern with your line manager or the Chief Executive Officer, then you can contact the Whistleblowing Officer.
- 8.3. If you are a line manager and one of your team have reported a concern to you, you should arrange to discuss the concern with them and try to resolve the concern informally in the first instance. If the concern cannot be addressed at this level, then you should encourage them to raise their concern to the Whistleblowing Officer.
- 8.4. Any whistleblowing submission will be kept on a register which will be reviewed by the Audit & Risk and Finance & Commercial Committee (ARFCC). The ARFCC will review all whistleblowing reports and will allocate certain reports for investigation depending on the position of the subject.

- 8.5. For further information on how to raise a concern and what steps will be taken if you do raise a concern, please refer to the Whistleblowing Procedure and Process.
- 8.6. The BlueLight Commercial Board reserves the right to appoint an external reviewing body if deemed appropriate and proportionate to the matter reported.

9. External Reporting

- 9.1. You are encouraged to raise any concerns through BlueLight Commercial's internal process first. However, in circumstances where you believe you cannot raise your concern directly to BlueLight Commercial, for example if you feel that you may be victimised or the concern covered up, you can report the matter directly to an external prescribed person or regulatory body such as:
 - 9.1.1. Public Concern at Work – This is an independent organisation that can provide lawyers who will discuss problems in confidence. They can be contacted on 0207 404 6609 or via the internet on www.pcaaw.co.uk.

10. Protecting You From Victimisation and Detriment

- 10.1. You need to be assured that it is safe and acceptable for you to voice any concerns you may have. BlueLight Commercial is committed to ensuring that you do not suffer victimisation or detriment as a result of raising a genuine concern under this Whistleblowing Policy. If you believe that you have suffered any type of reprisal by making a disclosure, you should liaise with your line manager, the Whistleblowing Officer or the HR Business Partner immediately, so they can support you and take any appropriate action. If you wish to make a formal complaint, you can raise this through the Grievance Policy.

11. False and Malicious Allegations

- 11.1. You will not be penalised at any time for raising a genuine concern in good faith. However, where it is felt that there has been an abuse of the whistleblowing process by the making of deliberately untrue, malicious or vexatious complaints, or making a disclosure for personal gain, you may be subject to disciplinary action, in line with the Disciplinary Policy.

12. Supporting You When You Raise a Whistleblowing Disclosure

- 12.1. BlueLight Commercial appreciates that it can be very challenging and stressful to raise a whistleblowing concern. Throughout any investigation, BlueLight Commercial will work with you directly, to ensure that you receive appropriate support. The level and type of support will be discussed with you.

13. Training

- 13.1. The following training plan will be adopted to ensure compliance with the policy:
- 13.1.1. Policies will be accessible to all staff via the intranet. These documents can be reviewed at any time and will remain available throughout your employment. Familiarise yourself with this policy by reading through the policy as part of your ongoing self-training. If you have any accessibility issues, please contact HR for assistance.
 - 13.1.2. Additional training if required/requested will be provided as necessary.
 - 13.1.3. Annual refresher training may be provided.

14. Communication

- 14.1. The following methods will be adopted to ensure full knowledge of the policy:
- 14.1.1. The policy will be published in the Document Management System (DMS), accessible through MS Teams or through the intranet.
 - 14.1.2. Any associated procedure or process will be published in the Document Management System (DMS), accessible through MS Teams or through the intranet.
 - 14.1.3. Any updates to the policy will be communicated by HR via email or via the staff Weekly Bulletin.

15. Review

- 15.1. As part of the corporate governance review, this policy will be reviewed annually, or more frequently as required, i.e. following an incident, organisational change, change in business operations or risk profile, to ensure the policy continues to fulfil its purpose.
- 15.1.1. Comments or suggestions regarding the policy are invited from users and should be directed to the Responsible Officer for consideration.
 - 15.1.2. The Responsible Officer is responsible for keeping this policy up to date.
 - 15.1.3. BlueLight Commercial reserves the right to amend the policy at any time.

16. Whistleblowing Procedure – A Guide For Employees

Whistleblowing Procedure A Guide for Employees, Secondees etc.

This guide provides information on the Whistleblowing Procedure. This includes the procedure for raising concerns internally and externally. This procedure document should be read in conjunction with the Whistleblowing Policy.

Upon joining BlueLight Commercial all employees are sent a copy of the College of Policing Code of Ethics. Employees are expected to adhere to the standards of professional behaviour as laid out in that document.

External Reporting

You are encouraged to raise any concerns through BlueLight Commercial’s internal channels first. However, if you feel that you cannot raise your concern directly with BlueLight Commercial, there are external organisations you can contact. Please see further details of this in the Whistleblowing Policy.

Internal Reporting

BlueLight Commercial will take any claims of wrongdoing seriously and will follow the internal procedure for each claim. Please follow the relevant procedure for raising a concern.

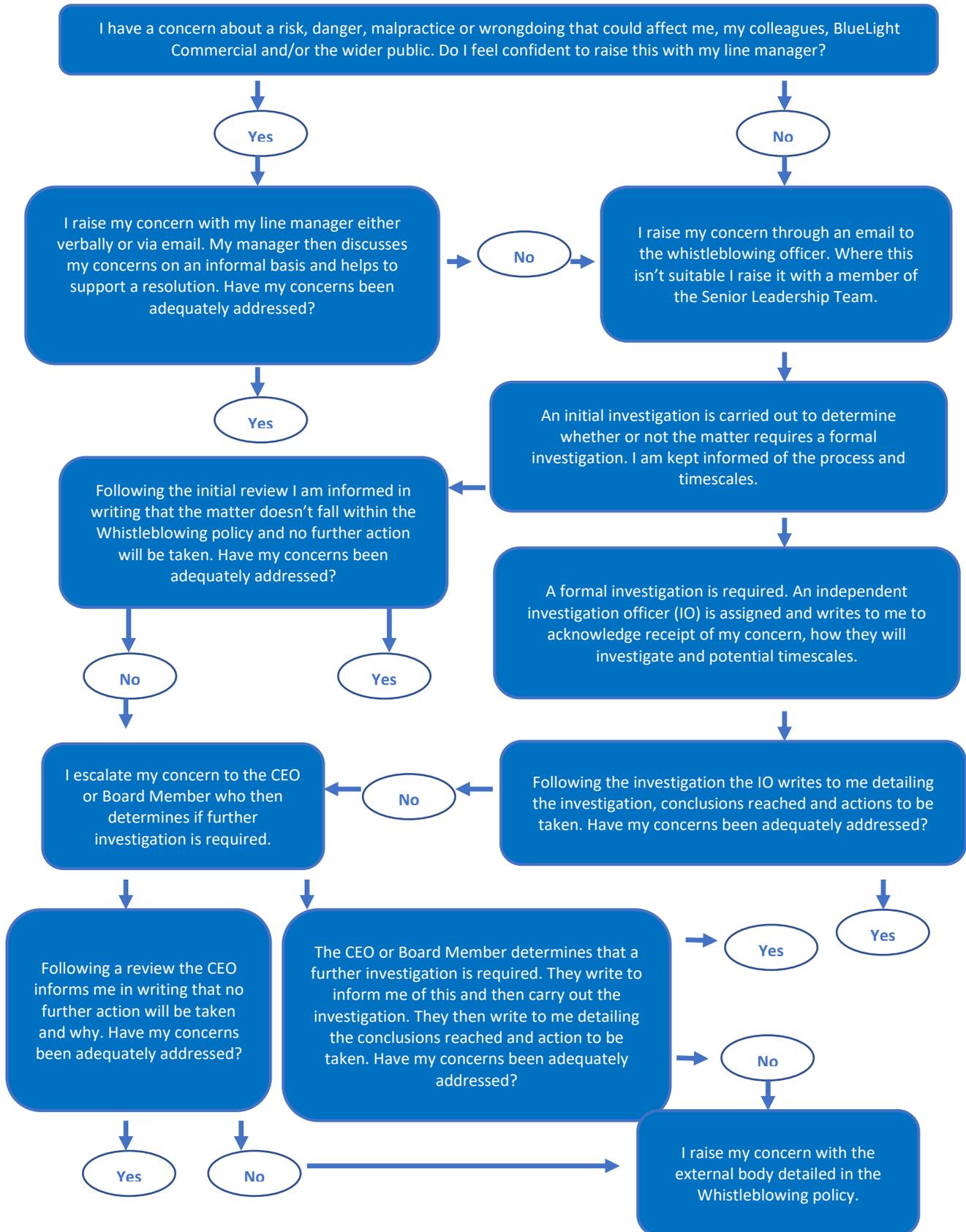
Stages of the Internal Whistleblowing Procedure

- Raising your Concern
- Raising a Confidential Concern
- Responding to your Concern
- Notifying you of the Outcome of the Investigation
- Escalating your Concern

<p>Raising your Concern</p>	<p>If you are concerned there is negligent, improper or illegal activity within BlueLight Commercial, you should report this without delay, highlighting that you are making a whistleblowing disclosure. You do not have to prove the allegations you are making; however, it is important that you are able to provide sufficient information and grounds for raising your concern. BlueLight Commercial would also encourage that you record your concern for your records, along with any attempts you make to raise this.</p> <p>You should initially raise the matter with your line manager, verbally or in writing. Your line manager will meet with you to discuss if the concern can be raised informally if it would be more suitable to follow one of BlueLight Commercial's other policies or if the concern should be raised with the Whistleblowing Officer. If, following the discussion with your line manager it is felt that the concern does need to be escalated you should raise this with the Whistleblowing Officer whistleblowing@bluelight.police.uk. You can also raise the concern directly with the Whistleblowing Officer in the first instance if you don't feel comfortable raising the concern with your line manager.</p> <p>Your concern will be dealt with in a sensitive and confidential manner and the information will only be shared with people who have a genuine and legitimate need to know. Equally, BlueLight Commercial expect you and anyone who accompanied you to meetings about your disclosure, to also respect and maintain confidentiality.</p> <p>If you are a line manager and one of your employees has reported a whistleblowing concern to you, you should discuss this with them to see if you can resolve their concern informally. Where this isn't possible you should support them in contacting the whistleblowing officer.</p> <p>When raising a concern, you will need to provide the following information:</p> <ul style="list-style-type: none"> • The nature of your concern and why you believe it to be true • The background and history of the concern (giving relevant dates)
<p>Raising a Confidential Concern</p>	<p>BlueLight Commercial are committed to honesty and transparency and will always encourage you to raise your concerns openly. However, if you want your identity to be kept confidential, you must state this when you raise your concerns. If you ask BlueLight Commercial to protect your identity, every effort will be made not to disclose it without your prior consent, unless required to do so by law.</p> <p>However, you must understand that there may be times when BlueLight Commercial cannot resolve a concern without revealing your identity; for example, when your personal evidence is essential to the case. In these circumstances, BlueLight Commercial will always discuss this with you first, preferably in person and consider how best to proceed.</p>

<p>Responding to your Concern</p>	<p>The level and type of action that is taken in response to your disclosure will depend on the nature of the allegations you have raised. In most cases, BlueLight Commercial will invite you to a meeting to discuss your concerns in more detail. You may be accompanied to this by a work colleague if you wish.</p> <p>If it is felt that your concerns are not a public interest disclosure but should be considered under another policy (for example: the Grievance Policy), this will be discussed with you and your complaint will then be referred through to the correct procedure.</p> <p>If it is determined that an investigation is required, an investigating manager will be appointed. Alternatively, depending on the nature of the disclosure and on rare occasions, BlueLight Commercial may decide to refer the investigation to an external body or person.</p> <p>In all cases, BlueLight Commercial will ensure the investigation is fair and equitable to you and anyone who is the subject of the allegations raised.</p> <p>BlueLight Commercial recognises and appreciates the need to keep you updated with key decisions and progress in regard to any investigation that is undertaken following the concern you have raised. Accordingly, the investigation will be conducted in a timely manner, and you will be kept informed at all significant points in the investigation, subject to maintaining the confidentiality of the investigation and that of any third parties.</p> <p>Alternatively, if after discussion with you and/or subsequent fact finding, it is felt that there are no grounds for proceeding with a formal investigation in regard to your concerns, you will be informed of that decision and the reason for it.</p>
<p>Escalating your Concern</p>	<p>If, following the conclusion of the internal review, you reasonably believe that appropriate action has not been taken, you should report to matter to the Chief Executive Officer, save as set out below, for further review and consideration. If, following the conclusion of this further internal review, you reasonably believe that appropriate action has not been taken, you should report the matter to a relevant regulatory external authority (see External Reporting section for further guidance).</p> <p>Where the concern raised relates to the Chief Executive Officer the matter should be reported to a BLC Board Member for further review and consideration. If, following the conclusion of this further internal review, you reasonably believe that appropriate action has not been taken, you should report the matter to a relevant regulatory external authority (see External Reporting section for further guidance).</p>

17. The Internal Whistleblowing Procedure





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