

# Whistleblowing Statement

## 1. Purpose

TPMG is committed to honest, responsible and lawful business conduct.

This Whistleblowing Statement explains TPMG's approach to raising concerns about wrongdoing, misconduct, unsafe practices, legal breaches or unethical behaviour. It is intended to give workers, contractors, suppliers, partners and other stakeholders confidence that concerns can be raised seriously and in good faith, and that TPMG supports a culture of openness, accountability and protection from retaliation.

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## 2. Scope

This Statement applies to concerns connected to TPMG's activities or those carried out for or on behalf of TPMG, including where relevant concerns raised by:

- employees and workers;
- consultants, contractors and agency personnel;
- suppliers, subcontractors and delivery partners;
- prospective suppliers or business partners;
- learners, clients or other stakeholders, where appropriate; and
- any other person who becomes aware of serious wrongdoing connected to TPMG's business activities.

This Statement is intended to provide a public summary of TPMG's position. More detailed internal procedures, reporting arrangements and case-handling steps may sit behind it.

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## 3. Our Commitment

TPMG is committed to:

- encouraging the prompt reporting of genuine concerns;
- treating concerns seriously and appropriately;
- supporting a culture in which people feel able to speak up;
- protecting those who raise concerns in good faith from retaliation so far as the law and circumstances allow;
- handling information sensitively and as confidentially as reasonably possible;
- assessing concerns fairly and proportionately; and
- taking action where issues are substantiated or risks require intervention.

Acas states that having a whistleblowing policy helps show staff the most effective way to raise concerns and how managers should respond, and GOV.UK confirms that whistleblowers should not be treated unfairly or lose their jobs because they blow the whistle.

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## 4. What Whistleblowing Means

For TPMG, whistleblowing means raising a concern about wrongdoing that is believed to be in the public interest, rather than simply a private complaint about a personal employment issue.

A whistleblowing concern may relate to matters such as:

- criminal offences;
- failure to comply with a legal obligation;
- miscarriage of justice;
- dangers to health and safety;
- environmental damage;
- bribery, corruption, fraud or serious unethical conduct;
- misuse of confidential or personal information;
- serious financial misconduct;
- modern slavery, exploitation or labour abuses; or
- deliberate concealment of any of the above.

This list reflects both the statutory categories in the Employment Rights Act and the subject-matter categories used in your example whistleblowing policy.

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## **5. Public Interest and Good Faith**

TPMG expects whistleblowing concerns to be raised honestly and in good faith.

A concern does not need to be proven before it is raised, but it should be based on a genuine belief that wrongdoing may have occurred, is occurring, or is likely to occur. GOV.UK and Acas both state that a whistleblowing disclosure must be in the public interest, meaning it affects others such as workers, customers or the public, and that protection generally applies where the person reasonably believes this to be the case.

Deliberately false, malicious or knowingly misleading allegations are not supported by this Statement.

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## **6. Protection from Retaliation**

TPMG will not knowingly tolerate retaliation against a person for raising a genuine concern in good faith through an appropriate route.

Retaliation may include dismissal, disciplinary action, demotion, threats, victimisation, loss of opportunity, adverse treatment or any other detriment connected to the making of a protected disclosure. The Employment Rights Act gives workers the right not to suffer detriment on the ground that they have made a protected disclosure.

Your example whistleblowing policy also expressly states that employees should suffer no detriment for making a disclosure in accordance with the procedure.

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## **7. Confidentiality and Anonymity**

TPMG recognises that people may be reluctant to raise concerns unless they trust that

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they will be handled sensitively.



TPMG therefore aims to:

- treat concerns as confidential so far as reasonably possible;
- share information only with those who need it to assess or investigate the concern properly;
- protect the identity of the person raising the concern where it is lawful and practicable to do so; and
- avoid unnecessary disclosure of sensitive information.

Anonymous reports may be more difficult to assess or investigate fully, but TPMG may still consider them where sufficient information is provided and the concern appears credible and serious.

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## 8. What Can Be Reported

Concerns that may be appropriate to raise under this Statement include, for example:

- bribery, corruption, kickbacks or improper inducements;
- fraud, theft, false accounting or dishonest reporting;
- data protection breaches, unlawful disclosure or misuse of confidential information;
- serious health and safety risks or unsafe practices;
- environmental harm or breaches;
- bullying, harassment or abusive behaviour where there is a wider public-interest element;
- modern slavery, forced labour or exploitation;
- serious breaches of legal or regulatory obligations;
- misuse of company assets or systems; and
- deliberate attempts to conceal wrongdoing.

Your example materials support this broader approach, especially by linking bribery and ethics concerns to whistleblowing routes.

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## 9. How Concerns Should Be Raised

TPMG encourages concerns to be raised as early as possible so they can be addressed before risk increases.

Concerns should normally be raised through an appropriate TPMG reporting route, such as the relevant contact point communicated by TPMG or the organisation's designated internal route where one applies. Acas guidance says it is good practice to consider the appropriate disclosure route, usually starting with the employer or the person responsible for the wrongdoing, though the law also recognises disclosures in certain circumstances to legal advisers, prescribed persons and others.

For public website purposes, concerns relevant to TPMG may be directed initially to:

- **General enquiries:** admin@tpmg-group.com
- **Data Protection Officer (for data/privacy-related concerns):** dpo@tpmg-group.com

Where a concern relates to an immediate risk to health, safety or life, emergency services or relevant authorities should be contacted without delay where appropriate.

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## 10. How TPMG Responds

TPMG aims to respond to concerns in a proportionate and responsible way. Depending on the nature of the concern, this may include:

- acknowledging receipt where appropriate;
- clarifying the issue and any supporting information;
- assessing whether the matter falls within whistleblowing or another process;
- taking steps to protect people, data, operations or evidence where necessary;
- investigating or reviewing the issue internally or with external support;
- escalating to leadership, legal advisers or authorities where required; and
- taking corrective, disciplinary, contractual or governance action where

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appropriate.



Acas guidance confirms that employers should take disclosures seriously and have a clear basis for responding to them.

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## 11. Relationship with Other Policies and Procedures

This Statement sits alongside TPMG's wider Trust & Compliance framework, including where relevant:

- Anti-Bribery & Ethics Statement;
- Supplier Code of Conduct;
- Data Protection Statement;
- Information Security Statement;
- Health & Safety Statement;
- ESG Statement; and
- other relevant policies, procedures or contractual arrangements.

Some concerns may be handled partly or wholly through another process depending on the issue involved, but this does not prevent a matter from being treated as whistleblowing where the legal criteria are met.

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## 12. Suppliers, Partners and Third Parties

TPMG expects suppliers, delivery partners and relevant third parties to support a culture in which serious concerns can be raised without retaliation.

Where TPMG becomes aware of credible concerns involving a supplier, contractor, delivery partner or subcontractor, it may:

- seek clarification or information;
- require cooperation with an assessment or investigation;
- expect corrective action within a reasonable timeframe;
- review onboarding or ongoing approval status; and

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- suspend, restrict or terminate the business relationship where appropriate, subject to contract and circumstances.

This is consistent with the way your wider supplier and ethics materials treat reporting, cooperation and corrective action.

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## 13. Limits of This Statement

This Statement supports the raising of serious concerns in the public interest. It is not intended to replace every other complaint or grievance route.

Issues that relate only to a personal employment matter with no wider public-interest dimension may be more appropriate for another internal process where one exists. Acas makes the same distinction between whistleblowing and personal grievances.

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## 14. Continuous Improvement

TPMG recognises that speak-up arrangements should be reviewed and improved over time.

This may be informed by:

- changes in law or guidance;
- lessons learned from issues raised;
- business growth or changes in delivery model;
- supplier or client expectations; and
- wider governance and risk-management developments.

Your examples similarly assume review and improvement rather than static policy documents.

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## 15. Contact

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Questions about this Statement or concerns about wrongdoing connected to TPMG may be directed to:

### **TPMG**

A trading style of TPMG Group Ltd  
Cardinal Point, Park Road, Rickmansworth, WD3 1RE

**Tel:** 020 7060 6228

**General enquiries:** [admin@tpmg-group.com](mailto:admin@tpmg-group.com)

**Data Protection Officer:** [dpo@tpmg-group.com](mailto:dpo@tpmg-group.com)

**Website:** [www.tpmg-group.com](http://www.tpmg-group.com)

Individuals may also seek independent advice about whistleblowing. GOV.UK's whistleblowing guidance and Acas both provide further information on legal protection and disclosure routes.

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## **16. Disclaimer**

This Statement is intended to provide a high-level public summary of TPMG's approach to whistleblowing and speaking up. It does not describe every internal reporting route, investigation step, protection measure or case-management procedure used by TPMG, and TPMG may amend or strengthen its arrangements from time to time in response to operational, legal, client or risk-based requirements.