Whistleblowing Policy – October 2026

1. Purpose and Scope

1.1 In-Form Solutions Ltd, a company registered in England and Wales under number 03961045, whose registered office is at 88 Hill Village Road, Four Oaks, Sutton Coldfield, West Midlands B75 5BE ("the Company"), wants everyone who works with it to feel safe to speak up about wrongdoing. This Policy explains how to raise a concern, how it will be handled, and the protection available.

1.2 It applies to employees, former employees, workers, agency staff, associate consultants, subcontractors, trainees and Directors. The law protects employees and workers who make a protected disclosure (Part IVA of the Employment Rights Act 1996, added by the Public Interest Disclosure Act 1998). The Company applies this Policy to everyone listed, whatever their status.

1.3 This Policy is not for complaints about your own employment, such as pay, workload or how you have been treated. These should be raised under the grievance procedure. If you are not sure which applies, raise the concern anyway and the Company will make sure it is dealt with properly.

2. What Concerns to Raise

2.1 You should raise a concern if you reasonably believe that it is in the public interest and that one or more of the following has happened, is happening or is likely to happen:

- a criminal offence, including fraud, theft or bribery;
- a failure to meet a legal or regulatory duty, including a breach of data protection law or of a client contract;
- a danger to anyone's health or safety, including patient safety at a client;
- damage to the environment;
- a miscarriage of justice;
- sexual harassment (included in the law since 6 April 2026); or
- someone deliberately hiding any of the above.

2.2 A concern can be about the Company, a client, a supplier or anyone else the Company works with, for example fraud or patient safety risks found while working for an NHS client.

2.3 You do not need proof, and you will not be at fault if you turn out to be mistaken, provided you reasonably believed what you reported. Do not investigate the matter yourself.

3. How to Raise a Concern

3.1 Raise your concern with the Managing Director, John Griffiths. If the concern involves the Managing Director, or you would rather not raise it with him, raise it with the Chairman, David Poynton.

3.2 You can raise a concern in writing, by email, by phone or in person. It helps to say that you are raising it under this Policy, and to explain what has happened, when, who is involved and why you are concerned. You may bring a colleague or trade union representative to any meeting.

3.3 When working for an NHS or other client, you can also use the client's own Freedom to Speak Up Guardian or whistleblowing procedure. Please let the Company know you have done so, unless the concern is about the Company.

4. Confidentiality and Anonymity

4.1 Your identity will be kept confidential and shared only with those who need to know to deal with the concern. If the Company has to reveal your identity, for example to the police or because the law requires it, it will discuss this with you first wherever possible.

4.2 You can raise a concern anonymously, but it may be harder to investigate and the Company will not be able to tell you the outcome. Protect, the whistleblowing charity, can advise you on how to raise a concern safely (see Part 7).

5. How Concerns Are Handled

5.1 The person receiving your concern will acknowledge it in writing within five working days and will usually arrange to meet you to understand it.

5.2 They will then decide what happens next. This may be an investigation, referral to another procedure such as the disciplinary or grievance procedure, or a report to an outside body such as the police, the NHS Counter Fraud Authority or the client concerned. Where a client contract requires the Company to tell the client, it will do so without revealing your identity unless you agree.

5.3 Any investigation will be carried out by someone with no involvement in the matter. Where needed, the Company will use an independent investigator, such as its Data Protection Officer for data matters, or an outside HR or legal adviser.

5.4 The Company will keep you informed of progress, normally at least every 20 working days, and will tell you the outcome. It may not be able to share full details, for example where confidentiality or another person's rights are involved.

5.5 If you are not satisfied with how your concern has been handled, raise it with the Chairman. You can also use the outside routes in Part 7.

6. Protection for People Who Speak Up

6.1 No one will be dismissed, disciplined, bullied or treated unfairly in any other way for raising a concern under this Policy. Anyone who does so will face disciplinary action, and may also be personally liable under the law.

6.2 No agreement, including a confidentiality clause or a settlement agreement, can stop anyone making a protected disclosure. Nothing in the Company's contracts is intended to do so.

6.3 Raising a concern that you know to be false will be treated as a disciplinary matter. Honest mistakes will not.

7. Raising Concerns Outside the Company

7.1 The Company hopes you will raise concerns internally first, so that it can put things right. You can, however, report to a "prescribed person" and still be protected by the law. These include:

- the Care Quality Commission, NHS England or Healthcare Inspectorate Wales, for health and care services;
- the Health and Safety Executive, for health and safety;
- HM Revenue and Customs or the Serious Fraud Office, for tax or serious fraud; and
- the Information Commissioner's Office, for data protection.

7.2 The full list is on GOV.UK ("Whistleblowing: list of prescribed people and bodies"). Fraud affecting the NHS can be reported to the NHS Counter Fraud Authority on 0800 028 4060 or at cfa.nhs.uk.

7.3 Disclosures to others, such as the media, are protected only in limited circumstances, so take advice first. Free, confidential advice is available from Protect on 0203 117 2520 or at protect-advice.org.uk. Seeking legal advice is always protected.

8. Records and Data Protection

8.1 Records of concerns are kept securely and separately from personnel files, and are seen only by those dealing with the concern. They are kept for six years after the case is closed, in line with the Data Retention Policy and Schedule, and handled in line with the Employee Data Protection Policy.

9. Responsibilities, Training and Review

Role	Responsibility
Chairman – David Poynton	Receives concerns that involve the Managing Director, and hears appeals about how a concern was handled.
Managing Director – John Griffiths	Owns this Policy, receives and manages concerns, and reports the number and type of concerns (without names) to the annual management review.
All staff and associates	Raise concerns, keep them confidential, support any investigation, and never treat anyone unfairly for speaking up.

9.1 Everyone is told about this Policy at induction, and it is available on SharePoint. It should be read with the Anti-Bribery and Corruption Policy, the Corporate Ethical Policy, the Equality, Diversity and Inclusion Policy and the Health and Safety Policy.

9.2 This Policy will be reviewed every 12 months, or sooner if the law changes.

This Policy has been approved and authorised by:

Name:	David Poynton	**Position:**	Chairman
Date:	29th October 2026	**Signature:**	
Issue:	Issue 3 (replaces Issue 2, 26 May 2023)	**Next review:**	October 2027