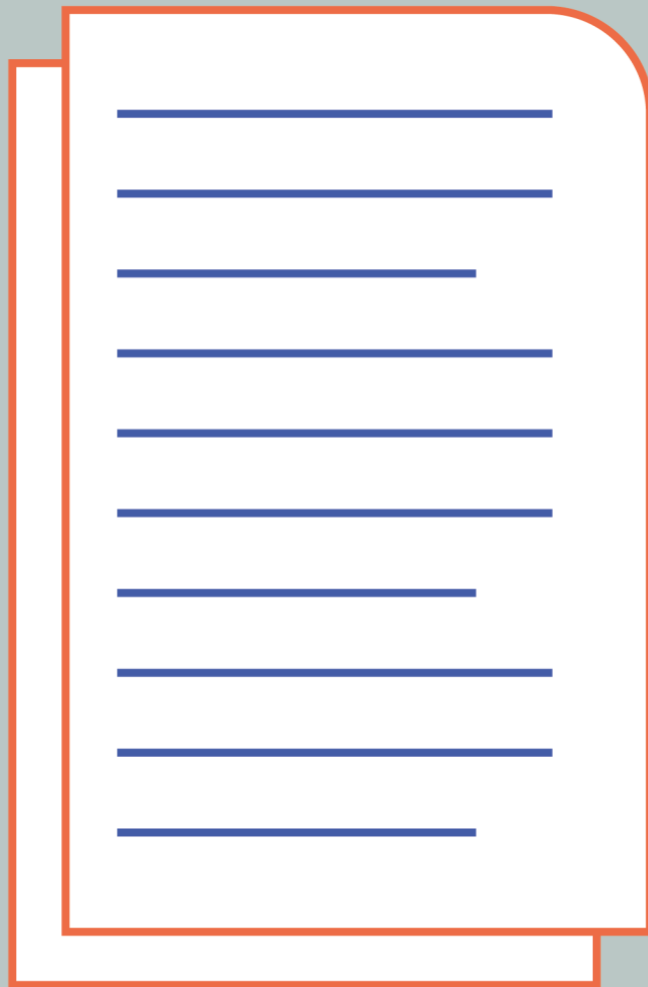


Whistleblowing Policy



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PURPOSE

The purpose of this policy is to ensure that you are aware of the procedure for whistleblowing. It is intended to encourage and enable you to raise serious concerns without fear of victimisation, subsequent discrimination or disadvantage.

CTQ is committed to the highest possible standards of openness and accountability. In line with that commitment, we expect you, and others who we deal with, who have serious concerns about any aspect of our work to come forward and voice those concerns within the Company rather than overlooking the problem or blowing the whistle outside the Company.

You are often the first to realise that there may be something seriously wrong within CTQ. However, you may not express your concerns because you feel that speaking up would be disloyal to colleagues or to CTQ. You may also fear harassment or victimisation. In these circumstances, it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.

This policy and procedure apply to all CTQ employees and associate staff/contractors. It also covers employers and those providing work under contract to CTQ.

These procedures are in addition to the Complaint's policy, Malpractice and Maladministration Policy and other statutory reporting procedures.

WHEN ARE YOU PROTECTED?

You are protected as a whistle-blower if you:

- are a worker
- believe that malpractice in the workplace is happening, has happened in the past or will happen in the future
- are revealing information of the right type (a qualifying disclosure)
- reveal it to the right person, and in the right way (making it a protected disclosure)

QUALIFYING DISCLOSURES

Certain kinds of disclosures qualify for protection. These are disclosures of information which are made in good faith and which you reasonably believe tend to show one or more of the following relevant failures is either currently happening, took place in the past, or is likely to happen in the future:

- a criminal offence, including fraud, corruption or acts of bribery
- breach of legal obligations
- endangering of an individual's health and safety
- damage to the environment
- miscarriages of justice
- deliberate concealment of information relating to any of the above

Your belief must be reasonable, but it need not be correct. It might be discovered subsequently that you were in fact, wrong or mistaken in your belief, but you must be able to show that you held the belief and that it was a reasonable belief to hold in the circumstances at the time of the disclosure. Note it is not your responsibility to investigate the matter; that is CTQ's responsibility.

You must also reasonably believe that your disclosure is made in the public interest. It will therefore not include disclosures which can be properly characterised as being of a personal rather than a wider public interest, for example a disclosure about a breach of the terms of your own contract of employment.

PROTECTED DISCLOSURES

For a qualifying disclosure to be a protected disclosure, you need to make it to the right person and in the right way. There are a number of methods by which you can make a protected disclosure, but CTQ encourages you to raise any disclosure internally in the first instance.

You are protected if you make a qualifying disclosure to either:

- CTQ, or
- Where you reasonably believe that the relevant failure relates solely or mainly to the conduct of a person other than CTQ or any other matter for which a person other than CTQ has legal responsibility, to that other person.
- You are encouraged to raise any qualifying disclosures that you may have by following the disclosure procedure set out below.
- If the concern relates to a breach of your own contract of employment, you should use the Grievance procedure.

DISCLOSURE PROCEDURE

This procedure applies to all permanent and temporary employees. In addition, third parties such as agency workers, consultants and contractors and any others who perform functions in relation to CTQ should use it.

If you wish to make a disclosure, you should, in the first instance, report the situation in writing to the Head of Quality, setting out the detail and the nature of the disclosure. If you do not wish to contact the above individual, you can instead contact the Responsible Officer.

Disclosures should be made promptly so that investigation may proceed and any action taken.

All qualifying disclosures will be treated seriously. The disclosure will be promptly investigated and as part of the investigatory process, you will be interviewed and asked to provide a written witness statement setting out the nature and details of the qualifying disclosure and the basis for it.

You will not be penalised for raising a qualifying disclosure even if it is not upheld, unless the complaint was both untrue and made with malice. If, however, you make

an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against you.

Once the investigation has been completed, you will be informed in writing of the outcome and the CTQ's conclusions and decision as soon as possible. We are committed to taking appropriate action with respect to disclosures which are upheld. Confidentiality will be maintained during the investigatory process to the extent that it is practical and appropriate in the circumstances. However, in order to effectively investigate a disclosure, CTQ must be able to determine the scope of the investigation and the individuals who should be informed of, or interviewed about, the disclosure. We reserve the right to arrange for another manager to conduct the investigation other than the manager with whom you raised the matter.

Once the CTQ's conclusions have been finalised, any necessary action will be taken. This could include either reporting the matter to an appropriate external government department or regulatory agency and/or taking internal disciplinary action against relevant members of staff. If no action is to be taken, the reasons for this will be explained to you.

If on conclusion of the above stages, you reasonably believe that appropriate action has not been taken, you may then report the matter externally. The following are possible contact points:

- Ofqual
- the local authority
- local Citizens Advice Bureau
- relevant Professional Bodies or Regulatory Organisations
- a relevant Voluntary Organisation

However, we encourage you to raise your concerns directly in the first instance, rather than externally. If you do take the matter outside of CTQ, you should ensure that you do not disclose confidential information.

POLICY REVIEW ARRANGEMENTS

This policy is subject to a three-year review cycle, or earlier, should any feedback or concern be brought to the attention of CTQ, to ensure it remains fit for purpose and the process and its outcomes are deliverable.

It is also reviewed as part of CTQ's continuous improvement monitoring through its annual self-assessment arrangements.