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Author	Fiona Morgan
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Overview & Introduction

We are committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards. However, all organisations face the risk of things going wrong from time to time. A culture of openness and accountability is essential in order to prevent wrongdoing occurring and to address it if it does occur. We encourage open dialogue and believe in addressing concerns directly and constructively.

Tina Sexton & Jessie Kelly have overall responsibility for the operation of this policy but may delegate elements of implementation or decision-making to HR Department Team Members.

This policy is reviewed regularly to ensure it remains up to date and in order to monitor its effectiveness. Any changes required will be implemented and communicated to our workforce.

This policy aims to:

- encourage staff to report wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- provide staff with guidance as to how to raise those concerns
- to reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

This policy does not form part of any employee's contract of employment and it may be amended at any time.

Scope

This policy applies to all individuals working at all levels of the organisation, including senior managers, officers, directors, employees, consultants, contractors, homeworkers, part-time and fixed-term workers, casual and agency staff (collectively referred to as staff in this policy).

This policy covers any serious breach or failure to comply with a policy relating to the safety of our employees, customers, vendors, partners or that seriously impacts the reputation or safety of our business. This includes (but is not limited to):

- Sexual harassment
- Fraud
- Bribery
- Disrepute
- Criminal Activity
- Assault
- Negligence

This policy should not be used for complaints relating to your personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Procedure. If you are uncertain whether something is within the scope of this policy you should seek advice from the Whistleblowing Officers, whose contact details are at the end of this policy.

Policies relating to this document include [BSS Modern Slavery Statement 2025](#), [POL011 IT User Policy](#), [POL039 Whistleblowing Policy](#), [POL043 BSS Fraud, Bribery & Money Laundering Policy](#), [POL050 BSS Social Engineering Fraud Policy](#), [POL067 Sexual Harassment Policy](#)

Reporting a Concern

We hope that in most cases you will be able to raise any concerns with your line manager or the Human Resources department. You may inform them in person or in writing if you prefer. They may be able to agree on a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to one of the Whistleblowing Officers.

However, where the matter is more serious, or you feel that your concern has not been addressed, or where you prefer not to raise it with them for any reason, you should contact a Whistleblowing Officer.

Useful information that can be included in your report includes:

- the name of the person(s) alleged to have committed the act / responsible for the incident
- the nature of the alleged act / incident
- the dates and times when the alleged act / incident occurred
- the names of any witnesses / other person that may be able to assist in the investigation
- any action already taken by you to stop the alleged act / incident
- if the person is not an employee, details of who / where that person works

Allegations will be fully investigated and treated as a disciplinary matter, although every situation will be considered on an individual basis and in accordance with the principles of our disciplinary procedures available on Compass: [Disciplinary & Dismissal Policy](#)

You will not be victimised for having brought a legitimate complaint.

Confidentiality

We hope that staff will feel able to voice concerns openly under this policy. However, if you want to raise your concern confidentially, you have the option to do so and we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, it will be discussed with you.

Should disclosures be made anonymously, it may result in investigations being more difficult or impossible where we cannot obtain further information from the reporter. Staff who are concerned about possible reprisals if their identity is revealed can come forward to a Whistleblowing Officer and appropriate measures can then be taken to preserve confidentiality. **If you are in any doubt, you can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.**

Disciplinary Action

If the decision is that the allegation of sexual harassment or victimisation is well founded, the harasser/victimiser will be liable to disciplinary action in accordance with our disciplinary procedure up to, and including, summary dismissal. An employee who receives a formal warning or who is dismissed for sexual harassment/victimisation may appeal by using our disciplinary appeal procedure.

When deciding on the level of disciplinary sanction to be applied, we will take into consideration any aggravating factors affecting the case. One example of aggravating factors is an abuse of power over a more junior colleague.

If, due to the investigation, it is concluded that your complaint is both untrue and has been brought with malicious intent, an investigation will be instigated which may result disciplinary action being taken against you.

Process

To report a concern please use our reporting tool: Navex EthicsPoint Incident Management. This is an Independent reporting web portal and freephone hotline operated by all Bytes Technology Group companies.

Bytes Software Services reporting is accessed via:

Web: <https://bytes.ethicspoint.com>

Mobile URL: <https://bytes.navexone.eu>

Phone: 0808 234 7287

Or you can use the Mobile QR code



Further Help and Support

Protect: Independent External party providing whistleblowing guidance

Helpline: 0203 117 2520

E-mail: whistle@protect-advice.org.uk Website: www.protect-advice.org.uk

Bytes Whistleblowing Officer:

Tina Sexton, Finance Director - Tina.Sexton@bytes.co.uk