
Whistleblowing Policy

Policy and Guidance for Whistleblowers

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1. Purpose and Scope of Policy

1.1 The Policy is designed to allow employees to raise concerns regarding any wrongdoing involving the actions of TfGM employees, consultants, contractors or sub-contractors carrying out TfGM's business. The policy seeks to protect those who raise concerns and ensure that those concerns are fully investigated. It sets out how TfGM will receive, review and respond to concerns raised by those covered by the policy and the scope of the Public Interest Disclosure Act 1998 (PIDA),

1.2 Under this policy all concerns raised by TfGM employees, both permanent and temporary, and also contractors, consultants, delivery partners etc who are contracted to work for TfGM will be dealt with. This policy also extends to any individual who wishes to raise an allegation of perceived wrongdoing such as members of the public, customers and service users. However, these persons are not protected under the PIDA.

This policy is not to be used for concerns which are able to be dealt with under other TfGM policies and procedures which enable employees to lodge a grievance, make a claim of bullying or harassment, or raise any other complaint relating to their conditions of employment and which have no related public interest element. Any such complaint will be dealt with under the appropriate HR Policy reporting procedure with the complainant signposted accordingly.

1.3 By having this Whistleblowing Policy in place, TfGM is able to demonstrate its commitment to taking all reported concerns seriously and to taking the necessary steps to investigate them without fear of prejudice, victimisation or disadvantage to the person raising the concern.

2. Policy Definitions

2.1 **Whistleblowing** is the disclosure of information made in the public interest relating to a perceived wrongdoing involving any aspect of TfGM's work or those who work for TfGM.

2.2 **The Public Interest Disclosure Act (PIDA)** is known as the whistleblowing law and is designed to encourage and enable employees and workers to speak out and to report suspected wrongdoing at work. This process is commonly known as "blowing the whistle".

2.3 **A qualifying disclosure** is a disclosure of information made to TfGM or other prescribed person which in the reasonable belief of the individual making the disclosure, is being made in the public interest and demonstrates that one or more of the following has occurred (or is occurring):

- (i) a criminal offence has been committed, is being committed or is likely to be committed.
- (ii) a person has failed, is failing or is likely to fail to comply with any legal obligation to which they are subject.
- (iii) a miscarriage of justice has occurred, is occurring or is likely to occur.
- (iv) the health or safety of any individual has been, is being, or is likely to be endangered.
- (v) the environment has been, is being or is likely to be damaged by an act performed by TfGM or its representatives.

In addition to the above, and in accordance with Employment Rights Act 2025 legislation, a further protected disclosure has been created which falls outside of the organisation's HR policies in instances where the whistleblower is not the victim of the alleged offence(s);

- (vi) Sexual harassment, including conduct amounting to sexual harassment (as defined in **TfGM Dignity at Work Policy**) has taken place, or is taking place;
- (vii) Information tending to show any matter falling within any one of (i) to (vi) above has been, is being or is likely to be, deliberately concealed.

2.4 A protected disclosure is a report made by an employee or other connected person of **any** qualifying disclosure which protects them from any kind of subsequent harassment, victimisation or dismissal by their employer.

2.5 A prescribed person is someone identified in regulations who is independent of the employee's organisation (eg not an employee) but usually has an authoritative relationship with the organisation, such as a regulatory or legislative body.

3. Policy Statement

3.1 The Whistleblowing Policy exists to:

- (i) Provide a culture of zero tolerance of any acts of fraud and corruption and other wrongdoing and to deter such acts.
- (ii) Encourage employees and others with serious concerns about any aspect of TfGM's activities to feel confident to come forward and voice those concerns.
- (iii) Ensure concerns are raised at an early stage, in the right way, so that critical information reaches the appropriate persons in TfGM who need to know and who are able to take immediate action.
- (iv) Provide the necessary safeguards to reassure those who raise concerns in the public interest and not maliciously or for personal gain, that they can do so without fear of

reprisals or victimisation or disciplinary action, regardless of whether these are subsequently proven.

- (v) Set out how TfGM will respond to individuals raising concerns and enable them to get feedback on any action taken.
- (vi) Ensure that those raising concerns know what to do in the event they are not satisfied with actions taken and outcomes reached.

4. Roles and Responsibilities

Role	Responsibilities
Assistant Director Internal Audit Group	<ul style="list-style-type: none"> • Overall responsibility for policy review and signoff. • Consider findings from reports produced relating to investigations undertaken from concerns raised under this policy
Head of Internal Audit	<ul style="list-style-type: none"> • Responsibility for policy maintenance and review. • To consider all referrals made under this policy to ensure an appropriate response is taken.
Group Chief Executive/Head of Legal/Managing Director	<ul style="list-style-type: none"> • To consider all referrals made to them under this policy to ensure an appropriate action is taken. • Consider findings from reports produced relating to investigations undertaken from concerns raised under this policy.
Chair of ARAC	<ul style="list-style-type: none"> • Consider findings from reports produced relating to investigations undertaken from concerns raised under this policy
Managers	<ul style="list-style-type: none"> • To ensure staff have knowledge of policy and are able to advise how/when/where any concerns for consideration under this policy can be raised.

All Employees	<ul style="list-style-type: none"> • An understanding of the policy. • To raise concerns (in accordance with the provisions of this Policy) regarding any wrongdoing involving the actions of TfGM employees, contractors or any aspect of TfGM's activities
Counter Fraud Specialist	<ul style="list-style-type: none"> • Lead the investigation of suspected concerns which have been raised in accordance with this policy, where this is deemed appropriate, including the subsequent reporting of findings, conclusions and recommendations • Maintain / keep under review this policy ensuring it continues to be fit for purpose, reflecting any changes in legislation or in response to any weaknesses in arrangements identified by investigation or other sources.

5. Policy Procedures

5.1 Raising a Concern

Concerns may be raised by full and part time employees, permanent and temporary employees, contractors, consultants, and delivery partner staff. These individuals will be protected under the TfGM Whistleblowing Policy in accordance with the provisions of the PIDA. Concerns may also be raised by members of the public, suppliers, customers, and service users. However, protection under the PIDA does not extend to these persons.

5.2 How and When to Raise a Concern

Where possible, concerns should be raised in writing, however, concerns made verbally also qualify as Whistleblowing under this policy.

As far as possible, the individual raising the concern should provide as much information as they reasonably can to explain the issue and enable TfGM to consider and, where appropriate, investigate the concern. This may include relevant background, dates, names, and any documents already available.

(Note : Providing contact details will enable any further information to be obtained if this is required, and also mean that any action taken to look into the allegations will be more effective than if the allegations have been made anonymously.)

The Reporting form in Appendix A of this Policy will assist in providing the necessary information to enable the concerns to be dealt with expediently.

Concerns should be raised as soon as there is a reasonable suspicion of wrongdoing as this will make it easier to investigate and reach an outcome. **Individuals should not investigate the matter themselves.** Where the concern raised is genuine, no adverse consequences will arise if the Whistleblower is found to be mistaken, or, following an investigation there is insufficient evidence to support the allegation(s).

5.3 Who to Raise a Concern to

Employees concerns should be initially raised with their line manager if they feel confident in doing so. The manager must then adhere to the confidentiality and anonymity safeguards as outlined in Page 10 of this policy. However, depending on the seriousness and sensitivity of the matter, or in circumstances where the concern involves the line manager, the concern should be reported to one of the following:

- TfGM Head of Internal Audit
- TfGM Head of Legal
- Group Chief Executive
- TfGM Managing Director.

Any concerns raised indicating wrongdoing by a member of the Audit and Assurance team will be immediately referred to the Head of Legal who will make appropriate arrangements for an independent investigation to be conducted.

Any concerns relating to the conduct of both the Heads of Legal and/or Head of Internal Audit shall be dealt with by the Group Chief Executive. In either of these circumstances the Audit and Risk Assurance Committee (ARAC) Chair shall be notified.

Exceptionally, where a concern is regarding the Group Chief Executive, then the organisations Non-Executive Directors shall be informed.

Concerns under the Whistleblowing Policy may be reported as follows:

To Audit and Assurance, by:

- Completing the [Online Whistleblowing Reporting Form](#) **(need to insert link)**
- Email to confidential.reporting@tfgm.com
- Contacting a member of the Internal Audit team on **0161 244 0813**

or in writing to:

David Knight

Confidential

Head of Internal Audit

Transport for Greater Manchester
2 Piccadilly Place
Manchester
M1 3BG

TfGM Head of Legal

[Email to jacqueline.elliott@tfgm.com](mailto:jacqueline.elliott@tfgm.com)

TfGM Managing Director

[Email to steve.warrener@tfgm.com](mailto:steve.warrener@tfgm.com)

Group Chief Executive

[Email to caroline.simpson@tfgm.com](mailto:caroline.simpson@tfgm.com)

Whilst employees are encouraged to raise concerns internally, if they do not feel comfortable in doing so, then they can make a protected disclosure to a described person or body on the list advocated by HM Government below:

<https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies>

5.4 Raising a Concern Externally

Concerns may also be raised with a prescribed body. Before raising a concern externally, the employee may first wish to discuss the matter confidentially with a manager, Trade Union representative, solicitor or professional body.

An employee raising a concern externally will be protected under the PIDA if they:

- (i) Reasonably believe that the concern they are raising is in the public interest;
- (ii) Reasonably believe that the facts and information provided are substantially true; and
- (iii) The substance of the concern falls within the remit of the prescribed person or body.

Anyone who is not a TfGM employee can still contact TfGM to raise any concerns or disclosures over wrongdoing and these will be treated in the same way. However, unlike disclosures made by employees, protection under PIDA law does not extend to disclosures made by members of the public.

5.5 How and When TfGM Will Respond to a Concern

TfGM will always respond to a concern. However, investigating a concern is not the same as either accepting or rejecting it. There may be a range of issues raised under this policy and, depending upon the nature of the concern, the most appropriate TfGM senior officer to investigate it will be determined. Those concerns that fall within the scope of other TfGM policies, such as Dignity at Work, will normally be dealt with under those policies' arrangements.

In order to protect individuals and those that are the subject of a concern, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. If appropriate, the matter may be referred to the Police or other appropriate body as required.

Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required, this will be taken before any investigation is commenced.

TfGM will formally respond to a Whistleblower within 5 working days to acknowledge receipt of a concern. Within a further 10 working days, TfGM will communicate to the Whistleblower the following :

- (i) How TfGM proposes to deal with the concern and the Policy under which it will be handled.
- (ii) Estimating the period of time it will take to provide a response on the outcome.
- (iii) Arrangements for Confidentiality.
- (iv) Details of any initial enquiries which may have been made.

- (v) The ongoing TfGM point of contact for the Whistleblower.
- (vi) If no action is planned, why this decision has been made.

Prior to responding to the Whistleblower, all proposed action shall be notified to, and agreed with, the Head of Internal Audit on behalf of the Managing Director and in consultation with the Head of Legal and the relevant Director.

Further information may need to be requested from the Whistleblower depending on the nature of the concerns, and clarity of the information provided. Where appropriate, a meeting will be held with the Whistleblower to gather further information and gain an understanding of the situation which has been raised as a concern.

At any meeting arranged to discuss concerns, the Whistleblower has the right to be accompanied by a person of their choosing such as a Trade Union representative or work colleague, as long as that person is not potentially going to be involved in the investigation information gathering process and/or involved in the area to which the concern relates.

TfGM will do what it lawfully can to minimise any difficulties that a Whistleblower may experience as a result of raising a concern. For example, if an employee is required to give evidence in criminal or disciplinary proceedings, advice will be provided in respect of the process and what is expected of them.

5.6 Anonymous Concerns

TfGM recognises that there may be circumstances where a Whistleblower may be worried about being identified when reporting a concern about their employer or fellow employees. TfGM will treat anonymous concerns seriously but encourages the individual to provide their name when reporting a concern as anonymous concerns are more difficult to investigate, and harder to substantiate. It will also not be possible to gather further information from the Whistleblower or give them any feedback if they cannot be contacted.

Nevertheless, concerns raised anonymously will always be considered. Any subsequent actions will however be at the discretion of the Head of Internal Audit in consultation with the Director of Finance, Commercial and Corporate Services and the senior responsible officer. Taking further action in response to the anonymous concern will depend on:

- (i) the seriousness of the issues raised;
- (ii) the credibility of the concern; and
- (iii) the likelihood of confirming the allegations from attributable sources.

5.7 Investigating the Concern

The investigation will be conducted in accordance with the Policy relating to the nature of the concern. Any concern raised relating to Fraud and Corruption will be investigated in accordance with the TfGM Fraud Response Procedures.

The investigating officer should use the Whistleblowing Case Record (see Appendix 2) to record the salient details of the concern raised, the investigation conducted and the outcomes of the investigation.

The Whistleblower will be advised of progress where investigations are of significant duration due to their complexity, otherwise the Whistleblower will just be advised of the outcome following completion of the investigation. In the case of concerns raised anonymously it is not possible to keep the Whistleblower informed of progress or the outcome.

5.8 Safeguards

In investigating concerns raised under this Whistleblowing Policy, the following safeguards are built into the processes and procedures followed to ensure that those raising concerns receive the legal protection under the PIDA.

5.9 Confidentiality and Anonymity

The identity of the individual raising a concern under the Whistleblowing Policy will be protected as far as possible.

Records of a Whistleblower's concerns and the investigation into them are stored securely with access restricted to specific officers assigned to examine the concerns raised. Wherever possible the identity of the Whistleblower will not be revealed as part of an investigation. Should this not be possible the individual will be notified, and consent will be sought beforehand.

Circumstances which may require the disclosure of an employee or workers identity and override their request for confidentiality, include disclosures related to any child at risk or abuse of a vulnerable adult. TfGM is required to investigate these matters under separate procedures which take priority over any request for confidentiality.

TfGM cannot guarantee to protect the identity of an employee raising allegations of serious wrongdoing where a criminal offence has been committed, and legal/prosecution action results from raising the concern. In some cases, the whistleblower may have to act as a witness and/or provide evidence in relation to offences which are referred to the Police. Where this occurs, the individual will be supported throughout the process.

Investigation progress and outcome reports will be anonymised.

5.10 Harassment and Victimisation

TfGM acknowledges that the decision to report a concern can be a difficult one for a whistleblower to take, not least because of the fear of reprisal from those responsible for the malpractice. It is unlawful for the Whistleblower to suffer victimisation or harassment for reporting a whistleblowing concern.

TfGM will not tolerate harassment or victimisation against a whistleblower who has raised a genuine concern under the whistleblowing policy. Victimisation may include an attempt to identify the person raising the concern. Any employee who victimises a whistleblower will be subject to disciplinary action which may lead to dismissal. An individual may also be personally liable for treating a colleague detrimentally on the grounds that they have raised public interest concerns.

Senior TfGM Officers should monitor how whistleblowers are subsequently treated after raising a concern. They should ensure that any harassment or victimisation is dealt with under the normal disciplinary process.

Any employee who feels they have been victimised or suffered detriment as a result of raising a concern should report their concerns to the TfGM People Director.

In addition, the following safeguards ensure the Policy is used for the proper purposes under the PIDA and action is taken where any abuse of the Policy occurs.

5.11 Malicious and Untrue Allegations

If an employee makes an allegation which they reasonably believe is a whistleblowing concern, but it is not confirmed by the investigation, no action will be considered or taken against them. However, if an employee makes false, malicious, or vexatious allegations this will be treated as a serious disciplinary matter and progressed in accordance with the TfGM Disciplinary Policy.

5.12 Misuse of the Policy

This Policy is not designed to allow:

- (i) An individual who has acted inappropriately to escape sanction by highlighting any malpractices they have been involved in;
- (ii) Employment protection in relation to a redundancy situation or any pre-existing disciplinary issues as a result of raising a concern.
- (iii) An individual to raise a concern for a private or purely personal motive.

5.13 Outcomes

Subject to legal constraints TfGM will inform the Whistleblower of the outcome of the investigation of the concern raised to provide assurance that the concern has been treated seriously and properly addressed. Feedback to the Whistleblower may not include details of all outcomes, for instance in cases where an individual's rights to confidentiality could be breached such as where disciplinary action against an employee has been taken. This will normally be done within one month of the investigation's completion.

Where an investigation has taken place a report must be produced by the Investigating Officer and circulated to:

- Group Chief Executive Officer
- Managing Director
- Functional Director
- Assistant Director of Internal Audit Group
- Head of Legal
- Chair of ARAC

Reports should conclude on whether concerns raised are fully or partially upheld or alternatively having no substance and whether any disciplinary action is necessary in response to wrongdoing and/or breaches of TfGM's constitution and governance. Reports should also set out any control improvements and the actions required to address them.

In circumstances where the whistleblower is not satisfied with the outcome of the investigation, TfGM recognises the lawful rights of its employees to make disclosures to a prescribed person (see page 4). If this course of action is taken, the whistleblower should inform TfGM and this be made known to the Group Chief Executive.

Outcomes of matters arising from whistleblowing cases will be considered for publication on TfGM's Intranet as part of the ongoing promotion of Counter Fraud and Corruption activity, although the confidentiality of any individual and disciplinary processes will be maintained.

5.14 Complying with Related Legislation

TfGM will always seek to protect the identity of a Whistleblower at all times following the individual first raising a concern through to the completion of investigation and reporting of outcomes. In circumstances where a request is received under the Freedom of Information Act 2000 that responding to would necessitate the disclosure of the identity of the Whistleblower then TfGM would first contact the Whistleblower to ascertain their wishes as to any disclosure and would then seek to comply with those wishes. The Freedom of Information Act 2000 contains exemptions which can be used to maintain the anonymity of the Whistleblower if the Whistleblower desires that their identity not be disclosed. This principle also applies to any individual who may be the subject of a concern.

When processing personal data as part of a whistleblowing investigation, TfGM will take all necessary precautions to protect such data and not to share it more widely than is necessary as part of the investigation. The UK General Data Protection Regulations and the Data Protection Act 2018 will be applied to all aspects of a Whistleblowing investigation.

To protect the rights of individuals under investigation, all investigation activity will be conducted so as to be compliant with the related provisions of the Human Rights Act 1998, the Equality Act 2010, and TfGM's Corporate Equality, Diversity & Inclusion Policy.

6. Policy Principles

6.1 The principles of this policy are that:

- (i) TfGM has a commitment to ensure that any individual who wishes to raise an allegation of perceived wrongdoing can do so under this policy. This matter can be raised anonymously and/or in confidence if the whistleblower wishes to do so.
- (ii) Any person who raises a "qualifying disclosure" is protected from any kind of subsequent harassment, victimisation or dismissal by their employer.
- (iii) TfGM will acknowledge the referral within 5 working days and, subject to legal constraints, inform the Whistleblower of the outcome of the investigation of the concern raised to provide assurance that the concern has been treated seriously and properly addressed.
- (iv) If an employee makes an allegation which they reasonably believe is a whistleblowing concern, but it is not confirmed by the investigation, no action will be considered or taken against them. However, if an employee makes false, malicious, or vexatious allegations this will be treated as a serious disciplinary matter and disciplinary action will be taken.

- (v) If the whistleblower is not satisfied with the outcome of the investigation the whistleblower has the right to raise the matter with a prescribed person.

7. Monitoring and Review

- 7.1 Directors and Heads of Service are responsible for ensuring employees are made aware of this Policy and any training needs which may arise from this policy are fulfilled. The TfGM induction process shall also ensure that new employees complete the Whistleblowing e-learning. All employees covered under this Policy's scope shall ensure that they read and understand this Policy and complete the Whistleblowing e-learning.
- 7.2 Audit and Assurance should be notified of all Whistleblowing concerns received. Each concern shall be logged by Audit and Assurance and a case reference allocated. Investigations carried out by senior managers shall be monitored by Audit and Assurance to ensure an outcome is arrived at. Senior managers are required to inform Internal Audit of the outcome of an investigation, providing a copy of the report to the Head of Internal Audit. The safeguarding principles of this policy will be applied at all times to information received and retained.
- 7.3 The records held by Audit and Assurance will be used to review the effectiveness of this Policy and to report annually to ARAC on this point together with providing statistics on the number and type of Whistleblowing concerns received and the outcomes.

8. Related Documents

- 8.1 Related policies relevant to this policy are listed below:
- TfGM Dignity at Work Policy
 - TfGM Equality, Diversity & Inclusion Policy

9. Appendices

Forms, and supporting guidance relevant to this policy, for use in conjunction with the Whistleblowing Policy process are listed below:

- **Appendix A:** (Whistleblowing Reporting Form)
- **Appendix B:** (Whistleblowing Case Record)
- **Appendix C:** (Whistleblowing Complaints Process Flowchart)

Frequently Asked Questions

What is the difference between whistleblowing and making a complaint or a grievance?

In general terms, whistleblowing occurs when an employee raises a concern about danger or illegality that affects others and which has a public interest dimension to it. The person blowing the whistle is usually not directly, personally affected by the danger or illegality. Consequently, the whistleblower rarely has a personal interest in the outcome of any investigation into their concerns. As a result, the whistleblower should not be expected to prove their case; rather they are raising the concern so others can address it.

A grievance or private complaint is, by contrast, a dispute about the employee's own employment position and has no additional public interest dimension. When someone complains, they are saying that they have personally been poorly treated. This poor treatment could involve a breach of their individual employment rights or bullying and the complainant is seeking redress or justice for themselves. The person making the complaint therefore has a vested interest in the outcome of the complaint, and, for this reason, is expected to be able to prove their case.

For example – bullying and discrimination issues should be dealt with under the TfGM respective policy or under our grievance procedure

Can a contractor working with but not employed by TfGM raise a concern about their own employer under this policy ?

Any complaints received which have been made under this policy will be considered, but may have to be dealt with as a separate matter depending on the nature of the complaint. It may be more appropriate to raise the matter with the contractors' own employer directly under their own similar whistleblowing policy arrangements

Can concerns be raised confidentially or anonymously?

TfGM encourages whistleblowers to identify themselves and raise concerns openly. Openness makes it easier for the organisation to assess the issue, work out how to investigate the matter, understand any motive and get more information. The effectiveness of any whistleblowing investigation may be limited where an individual chooses not to be identified. However, TfGM will treat anonymous concerns seriously.

An individual raises a concern confidentially if they give their name on the condition that it is not revealed without their consent. An individual raises a concern anonymously if they do not give their

name at all. Clearly, if the organisation does not know who provided the information, it is not possible to reassure or protect them.

Does the Public Interest Disclosure Act (PIDA) require an employer to keep a whistleblower's identity secret?

The simple answer is no - PIDA contains no specific provision on confidentiality. The protections within the Act can be deemed to encourage employees to raise issues openly. A good whistleblowing policy will provide a confidential port of call for a worried employee and employers should respect any promise of confidentiality they make. However, in some cases it will be impossible to take action on the concern without the open testimony of a whistleblower. Further it may later become necessary to waiver anonymity because of the course of the investigation for example if the matter has had to be referred to the police.

Am I protected from dismissal if I blow the whistle?

A worker cannot be dismissed because they blow the whistle. If they are, they can claim unfair dismissal and they will be protected by PIDA law as long as certain criteria are met. Types of whistleblowing eligible for protection are called 'qualifying disclosures', and include when someone reports:

- that someone's health and safety is in danger
- damage to the environment
- a criminal offence
- that the company is not obeying the law (like not having the right insurance)
- sexual harassment
- there has been or is likely to be a miscarriage of justice.
- that someone's covering up wrongdoing as described above

Who is protected?

The following people are protected:

- employees
- agency workers
- people that are training with an employer, but not employed
- self-employed workers, if supervised or working off-site A worker will be eligible for protection if:
- they honestly think what they're reporting is true

- they are telling the right person
- they believe that their disclosure is in the public interest

Who is not protected?

- individuals who break the law when they report something, for example because they signed the Official Secrets Act
- they were part of the wrongdoing

What information should a whistleblower provide?

Supporting evidence for the allegations, if available, is clearly helpful. However, the law does not require individuals to have evidence before reporting the matter, but it does say that the individual must reasonably believe the information is substantially true. Individuals should report concerns to line management or others at the earliest opportunity rather than wait to collate any evidence. Whistleblowers are encouraged to provide their contact details to allow TfGM to seek further information, where necessary and advise on outcomes.

Where can I get independent advice?

Before making a disclosure, an employee or worker may first wish to discuss the concern on a confidential basis with a manager, trade union representative, solicitor or professional body and seek advice on how to proceed. These discussions may help assess how justified the concern is, and if they then wish to proceed, the most appropriate and effective way to report it. Individuals can contact the independent charity Protect (formally Public Concern at Work) for free, independent and confidential advice, for example to find out which concerns are legally protected and how best to raise concerns. The charity has provided a specific confidential advice line, telephone number: 020 3117 2520 or visit their website www.protect-advice.org.uk.



Whistleblowing Reporting Form

Appendix A

To assist a Whistleblower in reporting a concern the form below should be used to enable the appropriate information to be gathered and the matter dealt with expediently. The form should be emailed to one of the persons in Page 7 of this policy document. Your information will be handled with strict confidentiality

1.	Do you wish to remain anonymous ? <input type="checkbox"/> Yes I wish to remain anonymous <input type="checkbox"/> No I am willing to provide my details (see below – part 11)
2.	What is the nature of the concern that you wish to report (Please provide as much information as possible)?
3.	To the best of your knowledge is the issue you wish to report still happening ? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure
4.	Please provide all the background information relevant to your concern including names, addresses of people or organisations involved in this matter. Please also advise of any dates of specific incidents you believe may have occurred .
5.	Do you have any evidence (eg digital/ physical documents) to support your concerns ? Yes <input type="checkbox"/> No <input type="checkbox"/>
6	If you have answered “Yes” to Question 5 - please advise what evidence is available and where it is held

7	<p>Are you able to provide this evidence ? (We will contact you further about this if you are able to provide the evidence)</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
8.	<p>Have you previously reported this concern_?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>
9.	<p>If you have answered "Yes" to Question 8 please provide details of who you have reported this to and when :</p>
10.	<p>Would you be prepared to provide a statement or testimony if required ? (If you are asked to provide a statement or give evidence, we will ensure you have the necessary support.)</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Unsure</p>
11.	<p>Please provide your name (leave blank if you wish to remain anonymous)</p>
12	<p><u>Please provide your contact details (email/phone number) - (leave blank if you wish to remain anonymous)</u></p>
13	<p>Date of Submission (dd/MM/yyyy)</p>

CONFIDENTIAL

Transport for Greater Manchester

WHISTLEBLOWING CASE RECORD

Date Whistleblowing Concern received:	
Name, Role Title, contact details of TfGM officer receiving the concern:	
How Concern raised (email/online/in writing/via 3 rd party)	
Name of Directorate , Function, Business Area to whom concern relates	
Name/role title of employee raising the concern: (or if anonymity requested)	
Was confidentiality requested/explained ?	
Details of concern raised	
Date of receipt of referral by Internal Audit	
Name of Person receiving referral	
Has acknowledgment been provided in accordance with WB Policy ? (eg within 5 working days of receipt and updated within further 10 working days)	
Name & Role title of Investigating officer	

Summary of Investigation Actions taken	
Summary of investigation outcome (concern substantiated, concern dismissed, concern malicious)	
Details of actions agreed and any control improvements necessary.	
Date of notification of outcome to Whistleblower and how informed (email, letter, verbally).	
Documents storage reference (network folder, case reference etc)	

Completed By:
Name:
Role title:

