TRUE

POLICY 21 · INTEGRITY POLICY

Whistle-blowing

How workers and staff can raise a concern about wrongdoing safely, inside TRUE and to outside bodies.

True Intel Ltd, trading as TRUE · Company no. 17255261

Version 1.0 · Approved by Victoria Phillips, Director · 3 November 2026

Anyone who works with TRUE can raise a concern about wrongdoing, safely and without fear of being treated worse. TRUE takes every concern seriously, and people can always go to an outside body.

1. Purpose and scope

1.1 This policy applies to TRUE workers, staff, contractors and volunteers. It follows the Public Interest Disclosure Act 1998, which protects people who raise concerns in the public interest.

2. What to raise

2.1 Raise a concern if you reasonably believe something is happening, has happened or is likely to happen, such as:

- a crime;
- a breach of the law, such as underpayment of the minimum wage, breaking the working time rules or misuse of personal data;
- danger to anyone's health or safety;
- a failure to keep young people safe;
- sexual harassment;
- damage to the environment; or
- someone covering any of these up.

2.2 You don't need proof, only a reasonable belief that it is in the public interest. A personal complaint about your own situation should go through the Complaints and Concerns Policy instead.

3. How to raise a concern inside TRUE

3.1 Raise it with Victoria Phillips, Director, in the app, by email at hello@true-agency.co.uk or in person.

3.2 Any concern about a young person's safety also goes to the DSL straight away.

3.3 If your concern is about Victoria Phillips, or you don't feel able to raise it inside TRUE, use the outside bodies in section 6.

4. What happens next

4.1 TRUE acknowledges your concern within 2 working days, looks into it and aims to tell you what it found within 20 working days.

4.2 Your identity is kept confidential if you ask. You can raise a concern anonymously, but it can be harder to look into.

5. Your protection

5.1 You will not be treated worse, lose work or have your Worker Agreement ended for raising a concern in good faith. Anyone who treats a whistleblower badly faces disciplinary action.

6. Raising a concern outside TRUE

Concern	Outside body
Health and safety	Health and Safety Executive (HSE)
Minimum wage or tax	HMRC
Personal data	Information Commissioner's Office (ICO)
The safety of a child or young person	Local authority children's services, the LADO, or the NSPCC Whistleblowing Advice Line
Equality and discrimination	Equality and Human Rights Commission
Free, confidential advice on whistleblowing	Protect, the whistleblowing charity

6.1 Going to the media first gives you less legal protection. Get advice from Protect first.

7. Records and review

7.1 TRUE keeps a confidential record of every concern and what was done, for 6 years after it is closed.

7.2 This policy is reviewed every year, and sooner if the law or TRUE's activities change.

Version	Approved by	Approved on	Next review
1.0	**Victoria Phillips, Director**	**3 November 2026**	**November 2027**