



Whistleblowing Policy

Vertex Health Advisory Ltd

Version: 1.0

Effective Date: 21 July 2026

Review Date: 21 July 2027

Approved by: Founder & Director, Vertex Health Advisory Ltd

1. Purpose

Vertex Health Advisory Ltd ("the Company") is committed to conducting its business with honesty, integrity, professionalism and accountability.

This Whistleblowing Policy provides a safe and confidential process for workers to report genuine concerns regarding wrongdoing, unlawful conduct or risks to individuals, the public or the Company. The Company encourages concerns to be raised at the earliest opportunity so they can be investigated appropriately.

No individual will suffer detriment for raising a genuine concern in good faith, even if that concern is ultimately not substantiated.

2. Scope

This policy applies to:

- Employees
- Directors
- Associate trainers
- Contractors
- Consultants

- Volunteers
 - Agency workers
 - Any individual working on behalf of the Company
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3. What is Whistleblowing?

Whistleblowing is the reporting of information which the individual reasonably believes shows wrongdoing occurring, has occurred or is likely to occur.

Examples include:

- Criminal offences
- Fraud or financial misconduct
- Bribery or corruption
- Breaches of legal or regulatory obligations
- Safeguarding concerns
- Serious health and safety risks
- Environmental damage
- Misuse of confidential information
- Deliberate concealment of wrongdoing
- Serious breaches of Company policies
- Conduct likely to damage the Company's reputation or public confidence

This policy is not intended for routine employment grievances, which should be addressed through the Company's Grievance Policy where applicable.

4. How to Raise a Concern

Concerns should be raised as soon as reasonably practicable.

Where possible, reports should include:

- A clear description of the concern
- Dates, times and locations
- Individuals involved
- Any available evidence
- Details of any witnesses
- Any actions already taken

Whistleblowing concerns should be reported by email with the subject line:

WHISTLEBLOWING

to:

Email: info@vertexhealthadvisory.com

If the concern relates to the Company Director, or the individual does not feel able to report internally, concerns may be raised directly with the appropriate external regulatory or enforcement body.

5. Confidentiality

The Company will make every reasonable effort to protect the identity of any individual raising a concern.

Information will only be shared where necessary to properly investigate the matter or where disclosure is required by law.

Anonymous reports will be considered; however, they may be more difficult to investigate thoroughly.

6. Investigation

Upon receiving a concern, the Company will:

- Acknowledge receipt where possible.
- Conduct an initial assessment.
- Determine whether a formal investigation is required.
- Appoint an appropriate person to investigate where necessary.
- Maintain confidentiality throughout the process.
- Take appropriate action where wrongdoing is identified.

The whistleblower may be contacted for additional information where appropriate.

Although the Company aims to provide updates where possible, confidentiality obligations may limit the information that can be shared regarding outcomes.

7. Protection from Victimisation

No individual who raises a genuine concern in good faith will suffer:

- Dismissal

- Disciplinary action
- Harassment
- Victimisation
- Discrimination
- Any other detriment because they have made a protected disclosure.

Any retaliation against a whistleblower will be treated as a serious disciplinary matter.

8. Malicious or False Allegations

Deliberately making false, malicious or misleading allegations is unacceptable and may result in disciplinary action or termination of any contractual relationship with the Company.

Concerns raised honestly and in good faith will not result in disciplinary action simply because they are not substantiated.

9. Record Keeping

The Company will maintain secure records of:

- Concerns raised
- Investigations undertaken
- Decisions made
- Actions implemented

Records will be handled in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

10. Related Policies

This policy should be read alongside the Company's:

- Safeguarding Policy
 - Complaints Policy (*Terms & Conditions*)
 - Code of Conduct (*Terms & Conditions*)
 - Equality, Diversity and Inclusion Policy
 - Data Protection and Privacy Policy (*Terms & Conditions*)
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11. Review

This policy will be reviewed annually, or sooner where legislation, regulatory guidance or Company operations require amendment.

12. VERSION CONTROL

Version	Created / Updated	Author / Reviewer	Review Date
1.0	21st July 2026	Philip Poskitt (Founder & Director)	21st July 2027

Company Information

The Whistleblowing Policy is issued by **Vertex Health Advisory Ltd**, a company registered in England and Wales.

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Website: www.vertexhealthadvisory.com

Company Registration Number: 17293196

ICO Registration: ZC194740

All prices are stated in pounds sterling (GBP). Vertex Health Advisory Ltd is not currently registered for VAT; therefore, no VAT is charged on our goods or services. Should our VAT status change, prices and invoices will be updated accordingly where applicable.