



# PeopleCert Whistleblowing Policy

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Internal

Dream it, do it.



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| Version                   | Date       | Description of Change  |
| 1.0                       | 16/12/2024 | Initial version (Replacing documents QME_PO_10-3 Whistleblowing Policy & QME_PO_10-4 Whistleblowing Policy PeopleCert) |
|                           |            |  |
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|                           |            |  |

## About Us

PeopleCert is the global leader in best practice frameworks and certifications dedicated to enhancing organisational efficiency and individual careers. Present in 200+ countries, our products, including ITIL®, PRINCE2®, DEVOPS INSTITUTE®, and LANGUAGECERT®—benefit millions worldwide, spanning 82% of Fortune 500 companies and 800 government organisations. Through innovation, security, and superior customer experience, PeopleCert empowers people and organisations to achieve their full potential through learning. LANGUAGECERT® is a UK-registered awarding organisation, responsible for the development and awarding of language qualifications. It is recognised and regulated by Ofqual and Qualifications Wales and approved by UK Visas & Immigration as a Secure English Language Test (SELT) Provider worldwide.

## 1 Introduction

### 1.1 Purpose

The purpose of the Whistleblowing policy is to:

Establish and promote a culture of openness, transparency, and accountability within PeopleCert and among all stakeholders.

Encourage staff, partners/Accredited Organisations (AOs), centres, candidates and other stakeholders to raise concerns related to examination and certification services.

Protect the rights and interests of all parties involved in the delivery of services.

Provide channels for individuals to “speak up” or “blow the whistle” without fear of reprisal.

Address potential problems swiftly and effectively through open communication.

Foster integrity and trust in the operations of PeopleCert.

#### 1.1.1 What is whistleblowing?

Whistleblowing is the act of reporting suspected serious misconduct, malpractice, maladministration, or attempts to cover up such actions, whether they occur within or outside the workplace in relation to our operations and their impact on the integrity, quality, or legality of the organisation. This may involve actions committed by an accredited/approved organisation and can include fraud, bribery, misuse of accreditation, non-compliance with regulations, security breaches, safety risks, or unethical practices in examinations and certifications. Whistleblowers bring these concerns forward to uphold standards, ensure compliance, and protect the public interest.

It is important to distinguish whistleblowing from complaints and employment disputes. While the scope of whistleblowing focuses on systemic issues that undermine integrity and compliance, potentially affecting organisational practices and public trust, complaints generally involve personal grievances or dissatisfaction, (e.g. with a product or service being received and/or encountered) and should be addressed following the procedures outlined in our Complaints policy, <https://www.peoplecert.org/terms-of-service-and-privacy-policy#undefined>. Employment disputes on the other hand, pertain to conflicts between employers and employees related to workplace rights, responsibilities, or conditions, often involving legal or contractual obligations and seek to address these issues through the employer or another appropriate authority.

## 1.2 Scope

Recognising the legitimate apprehensions individuals may have about reporting issues, PeopleCert has set a number of policy rules and procedural controls to create a framework and address these concerns. PeopleCert follows best practices and recognised standards in order to comply with all national and international laws.

## 1.3 Review arrangements

PeopleCert will review this policy annually as part of its self-evaluation arrangements and revise it, when necessary, in response to external feedback, trends and changes in our practices, actions from the regulatory authorities or external agencies or changes in legislation.

## 1.4 Approvals

The approvals for the annual revision of the Whistleblowing Policy are provided by the Legal, Quality, and Human Resources divisions. These divisions work together to ensure the policy remains legally compliant, aligns with organisational values, and effectively meets stakeholder needs.

## 2 Key Policy Areas

### 2.1 Legal and Regulatory Framework

The UK Public Interest Disclosure Act 1998 (“PIDA”), Directive (EU) 2019/1937 and Greek Law 4990/22 are being adopted as minimum Standards for Whistleblowing within PeopleCert Group. This Whistleblowing policy applies to the entire PeopleCert portfolio of certifications including LANGUAGECERT®’s UK Home Office approved Secure English Language Tests (SELTs).

#### 2.1.1 UK Public Interest Disclosure Act 1998 (“PIDA”)

Under PIDA, individuals may raise a concern (“a disclosure”) with PeopleCert under the arrangements outlined in this policy if they reasonably believe that malpractice and/or a wrongdoing has occurred, is occurring or is likely to occur relating to one or more of the following categories. For a disclosure to be protected by PIDA’s provisions it must relate to matters that “qualify” for protection under this Act. Qualifying disclosures are disclosures that the individual reasonably believes show that one or more of the following matters is either happening now, took place in the past, or is likely to happen in the future:

A criminal offence

The breach of a legal obligation

A miscarriage of justice

A danger to the health and safety of any individual

Damage to the environment

Deliberate concealment of information regarding any of the above five matters (e.g. covering up a wrongdoing).

In addition, an individual raising a disclosure under these whistleblowing arrangements should have a reasonable belief that the disclosure is in the public interest. This means that the disclosure must affect others (e.g. the general public).

PIDA also protects whistleblowers for disclosures to a number of different people, such as to employers, legal advisers, Ministers of the Crown and a number of prescribed regulators (for certain purposes). For example, Ofqual (the regulator in England) is a prescribed body for whistleblowing.

#### 2.1.2 Greek Law 4990/2022

Greek Law 4990/2022 transposes Directive (EU) 2019/1937 of the European Parliament, which regulates the protection of individuals who report violations of European law. This law establishes a framework to protect employees, business partners, and anyone associated with a company or organization who report legal violations, ensuring they are shielded from retaliation for their disclosures. Under L. 4990/2022 individuals acting in good faith and with the aim of safeguarding the public interest may address breaches of EU legislation in areas such as:

Environmental protection

Public health

Food safety

Anti-corruption measures

Personal data protection

Financial regulations, etc.

### 2.1.3 Data Protection

In line with the General Data Protection Regulation (“GDPR”) and UK GDPR, PeopleCert safeguards all personal data associated with whistleblowing disclosures, ensuring confidentiality and compliance with data protection standards.

## 2.2 Protections for Whistleblowers

### Anonymity and confidentiality (non-retaliation)

Sometimes a person making an allegation may wish to remain anonymous, although it is always preferable to reveal your identity and provide us with your contact details. We will treat anonymous allegations just as seriously as those made openly, however, if you make a disclosure anonymously, we may not be able to investigate your concerns as effectively.

If you are concerned about any potential adverse consequences that could arise from your identity being revealed to another party, please inform us, and we will take all reasonable steps to ensure your details remain confidential.

While we prioritize maintaining confidentiality, we may need to disclose your identity where it is required by law. We do take the issue of maintaining the confidentiality of whistleblowers seriously and we will protect your identity as far as possible.

We encourage you to give us information in writing, even if you initially contact us by telephone. If you are worried about doing this, we would prefer you to provide an anonymous disclosure to us, rather than refraining from reporting serious wrongdoing.

The investigator assigned to explore the allegation will not reveal the whistleblower’s identity and will keep it confidential unless the whistleblower has no objection to such disclosure or if it is required by law.

The investigator will inform you if it becomes necessary to reveal your identity against your wishes. A whistleblower should also recognise that they may be identifiable by others because of the nature or circumstances of the disclosure (e.g. the party against which the allegation is made may manage to identify possible sources of disclosure without such details being disclosed to them).

### 2.3 Who can report under this policy

Under this Whistleblowing Policy, reports can be made by all potential stakeholders, including, but not limited to, members of staff of PeopleCert, members of staff of Accredited/Approved by PeopleCert Organisations, Accredited Organisations themselves, trainers, trainees and/or candidates.

### 2.4 What can be reported

The following list serves as a guide, outlining the key areas of the whistleblowing policy with indicative examples of potential disclosures and their relevant reference sections.

The list is not exhaustive and other serious concerns related to malpractice, maladministration, or breaches of integrity within our operations may also be reported.

Depending on the type of concern, please refer to the appropriate Section (3, 4 or 5).

| Key Area                         | Types of Concern   | Reference & Contact Details  |
|----------------------------------|--|--|
| <b>Internal Workplace Issues</b> | <b>Workplace Misconduct</b><br>Engaging in discriminatory behaviour, harassment, or unethical conduct by employees or associates | <b>Section 3</b><br><a href="mailto:whistleblowing.hr@peoplecert.org">whistleblowing.hr@peoplecert.org</a> |

| Key Area   | Types of Concern  | Reference & Contact Details   |
|--|---|---|
|  | <p>that violates workplace policies and undermines organizational integrity.</p> <p><b>General Business Misconduct:</b> Includes actions such as fraud, Non-compliance with law, etc.</p>   |   |
| <p><b>Operational Integrity and Compliance Issues:</b></p> <p><b>A. Regulated (LC, LC SELT)</b></p> <p><b>B. Non-Regulated (Business &amp; IT)</b></p> | <p><b>Fraud and Misrepresentation:</b> Making fraudulent claims for certifications, falsifying exam results, or deliberately submitting false information to obtain a certification.</p> <p><b>Cheating and Malpractice:</b> Providing inappropriate assistance during exams, using unauthorised materials, impersonating candidates, or engaging in other unethical practices, such as plagiarism, copying from another candidate, or cheating.</p> <p><b>Non-compliance with Accreditation and Examination Standards:</b></p> <ul style="list-style-type: none"> <li>• Using non-accredited trainers or invigilators, failing to follow proper examination procedures, or misusing logos, trademarks, or misrepresenting accreditation status.</li> <li>• Denying access to premises, records, information, candidates, and staff to any authorized PeopleCert representative or regulatory authority.</li> <li>• Withholding or delaying critical information needed to maintain quality standards.</li> </ul> <p><b>Confidentiality Breaches:</b></p> <ul style="list-style-type: none"> <li>• Losing, stealing, or breaching confidentiality of exam materials.</li> <li>• Inappropriately distributing or storing exam materials, leading to privacy violations.</li> <li>• Amending, copying, or distributing exam papers/materials without authorisation.</li> </ul> <p><b>Intellectual Property Breaches:</b></p> <ul style="list-style-type: none"> <li>• Offering unaccredited training or unauthorized use of logos and trademarks.</li> <li>• Unlawfully reproducing copyrighted material or distributing PeopleCert's exam papers/materials without permission.</li> <li>• Reproducing PeopleCert's material in any commercial product or service for resale or redistribution without approval or a separate IP license.</li> </ul> <p><b>Administrative Maladministration and Legal Non-compliance:</b> Failing repeatedly to comply with applicable regulations or adhere to PeopleCert's terms and conditions, undermining the integrity of both the certification process and the organization.</p> <p><b>General Business Misconduct:</b> Includes actions such as fraud, Non-compliance with law, etc.</p> | <p><b>A. Section 4</b><br/><a href="mailto:quality@languagecert.org">quality@languagecert.org</a></p> <p><b>B. Section 5</b><br/><a href="mailto:Whistleblowing@peoplecert.org">Whistleblowing@peoplecert.org</a> OR<br/><a href="mailto:quality@peoplecert.org">quality@peoplecert.org</a></p> |

## 3 Internal Workplace Issues

### 3.1 How to report

To initiate the whistleblowing process, individuals are required to contact the appropriate team within PeopleCert, depending on the nature of the concern.

For concerns involving HR-related issues or allegations, individuals should raise their concerns through the designated HR communication channels.

The company has a designated internal channel for reporting: the **Whistleblowing Officer**, who is the HR Director (or, in his/her absence or impediment, the VP of People and Culture). This role is assigned the responsibilities and obligations as outlined in Articles 10 and 16 of Law 4990/22, which together form a unified protection framework for individuals reporting breaches.

Employees are required to submit their reports to the Whistleblowing Officer in accordance with the relevant internal company policy HRM\_PO\_12 Whistleblowing Policy Greek Law 4990/2022. If the report concerns the Whistleblowing Officer, the report is submitted directly to the CEO of the Company.

The Whistleblowing Officer informs the Reporting person about further actions taken or the decision to archive the Report within a reasonable period of time (not exceeding three months from the receipt of the Report).

### 3.2 Investigation Process

PeopleCert is committed to ensuring that all reports are treated with strict confidentiality and investigated in a timely and thorough manner. The company guarantees that no retaliation or discrimination will result from reporting concerns in good faith.

#### 3.2.1 Procedure Upon Receiving a Whistleblowing Allegation

Upon receiving a whistleblowing allegation, PeopleCert is committed to fulfilling its duty to investigate the matter thoroughly, even if the whistleblower later wishes to withdraw his/her consent. Regulatory requirements oblige us to follow up on all allegations of malpractice or maladministration.

#### 3.2.2 Investigation Process:

- 1. Appointment of an Investigator:** Based on the nature of the allegation, an investigator will be appointed who possesses the necessary training and impartiality. The appointed investigator(s) may contact or meet with the whistleblower as soon as possible to gather details of the concern raised.
- 2. Confirmation of Allegation Details:** If the whistleblower does not wish to provide a written statement, the investigator(s) will draft a brief summary of the concern(s). The whistleblower will be required to confirm in writing that this summary accurately reflects the concerns raised.
- 3. Right to Accompaniment:** During meetings with the investigator(s), the whistleblower has the right to be accompanied by a work colleague, trade union representative, or another individual, such as a friend or independent witness, at both this and any subsequent meetings.
- 4. Conducting the Investigation:** The investigator(s) will then proceed with the investigation to establish the facts, following the guidelines outlined in the company's Malpractice and Maladministration policy.

PeopleCert ensures that all allegations will be investigated with impartiality and confidentiality, respecting the rights of all parties involved while complying with applicable laws and regulations.

We will acknowledge and keep whistleblower contacts updated on the progress of our investigation into their allegation/s. We will treat all cases fairly and properly, but it may not be appropriate for us to enter into discussions regarding all concerns raised.

### **3.3 Outcomes of investigation**

In the event that an investigation confirms a case of malpractice and/or maladministration, appropriate action will be taken against the relevant parties, in accordance with the procedures outlined in our Malpractice and Maladministration Policy and, where applicable, the Sanctions Policy.

If the investigation concludes that the allegation is not substantiated, and it is determined that the whistleblower (did not intentionally raise a false allegation, no action will be taken against you by PeopleCert.

### **3.4 External Reporting**

In cases where the allegation arose from a genuine misunderstanding, the individual(s) involved in the investigation, such as a Test Centre staff member, will be expected to harbour no malice or ill will towards the accuser. Furthermore, all colleagues are reminded that mistreatment of a whistleblower is unacceptable. However, should the investigation establish that the whistleblower knowingly made a false allegation, disciplinary measures may be taken by the whistleblower's employer.

The Reporting party has the ability to directly submit an external complaint to the National Transparency Authority (N.T.A., Lenorman 195 & Amfiarau, Postal code 104 42, Athens - email: [kataggelies@aead.gr](mailto:kataggelies@aead.gr), <https://aead.gr/submit-complaint>), if: (a) they reasonably believe that their Report cannot be effectively addressed by the company's Whistleblowing Officer or that there is a risk of retaliation, and (b) while they have submitted a Report to the Company's Whistleblowing Officer, it has been archived or they believe it was not effectively addressed.

## 4 Operational Integrity and Compliance Issues: Regulated

In United Kingdom, the Reporting party may report to an external authority know as a prescribed person or body. A full list of prescribed people and bodies is available on the UK government website [Whistleblowing: list of prescribed people and bodies - GOV.UK](#).

### 4.1 How to report

#### 4.1.1 How to raise a concern to PeopleCert or LANGUAGECERT®

To raise an allegation under our whistleblowing arrangements, you can contact our Quality team at [quality@peoplecert.org](mailto:quality@peoplecert.org) or [quality@languagecert.org](mailto:quality@languagecert.org) or telephone number: +44 (0) 203 564 7044 (all countries).

If you raise an allegation, it is helpful to provide us with as much information and supporting evidence as possible. This information will help to inform the nature of any investigation we carry out.

It is not essential to have clear evidence before making an allegation under this policy; however, we will ask that you explain as fully as you can the nature of the allegation or circumstances that gave rise to your concern.

#### 4.1.2 How to raise a concern to other Authorities

We hope this policy provides you with the confidence to initially raise any disclosure with PeopleCert. However, we recognise that you may still wish to report a disclosure directly to the appropriate regulator. For your information, the exam regulators in England and Wales (Ofqual and Qualifications Wales) whistleblowing policies/information are provided below:

- Ofqual: <https://www.gov.uk/guidance/ofquals-whistleblowing-policy>
- Qualifications Wales: <https://qualifications.wales/about/complaints/#whistleblowing-disclosures>
- Examples of whistleblowing disclosures that could be made to LANGUAGECERT® include: A member of staff at a Test Centre making a disclosure about actual or possible malpractice at the Test Centre and/or the Centre's failure to comply with the terms of its centre approval agreement with LANGUAGECERT® (see our Malpractice and Maladministration policy for examples).
- Making a disclosure about possible malpractice being carried out by a member of LANGUAGECERT®.
- A candidate or parent/guardian making a disclosure about possible malpractice at one of our approved Test Centres.

If you are unsure about the best course of action, you can speak confidentially with our Quality team at [quality@peoplecert.org](mailto:quality@peoplecert.org) or [quality@languagecert.org](mailto:quality@languagecert.org) or reach out to Protect (referred to in the *Seeking independent advice* section of this policy).

### 4.2 Investigation Process

Once an allegation has been raised, we have a duty to pursue the matter. If an individual withdraws their allegation, it will not prevent the matter being investigated as we are obliged by the regulators to follow-up and investigate allegations of malpractice or maladministration.

Upon receipt of an allegation, the Quality Officer will assign an investigator with the appropriate level of training and competence and ensure that they have no previous involvement or personal interest in the matter.

The investigator may contact/meet with the individual who raised the allegation (the whistleblower) as soon as possible to ascertain the allegation details. If the whistleblower does not wish to make a written

statement, the investigator will write a summary of the allegation. The summary will be provided to the whistleblower to review and to confirm it is accurate. A work colleague, trade union representative or another individual (e.g. friend/independent witness) may accompany the whistleblower at this and any subsequent meeting.

The investigator will then conduct an investigation to establish the facts in accordance with the arrangements in our Malpractice and Maladministration policy.

In all cases, we will keep the whistleblower updated as to how we have progressed the allegation (e.g. we have undertaken an investigation) and the whistleblower will have the opportunity to raise any concerns about the way the investigation is being conducted. However, we will not disclose all details of the investigation activities, as it may not be appropriate for us to disclose full details of the outcomes of the investigation for confidentiality or legal reasons. We cannot guarantee that we will disclose all matters in the way the whistleblower might wish, but we will strive to handle the matter fairly and properly.

### 4.3 Outcomes of Investigation

If the investigation results in a proven case of malpractice and/or maladministration, we will take action against the relevant parties in accordance with the arrangements in our Malpractice and Maladministration policy and, where necessary, our Sanctions policy.

If the allegation is not proven by investigation, provided that you (the whistleblower) did not deliberately raise an allegation that you knew to be untrue, no action will be taken against you by LANGUAGECERT®.

If the allegation was made because of a genuine misunderstanding, the individual(s) (e.g. Test Centre staff member) who has/have been the subject of the investigation will be expected to bear no malice or ill feeling towards their accuser, while colleagues should not mistreat a whistleblower.

If, however, the investigation concludes that you (the whistleblower) raised an allegation that you knew not to be true, disciplinary action may be taken against you by your employer.

### 4.4 Seeking independent advice under PIDA

PIDA legislation protects workers who make a protected disclosure of information concerning certain types of matters relating to their employment from being dismissed or penalised by their employers as a result of the disclosure. PIDA also has the effect of making confidentiality clauses unenforceable where a protected disclosure is made.

We recommend that you seek advice before making a whistleblowing allegation to ascertain your rights under PIDA. For example, if you want independent advice at any stage about your rights and protection, we recommend that you contact Protect (formerly Public Concern at Work (PCAW)) via the details below. Protect is a registered charity and is the independent authority on public interest whistleblowing.

- Website: [protect-advice.org.uk](https://protect-advice.org.uk)
- Email: [whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk)

## 5 Operational Integrity and Compliance Issues: Non-Regulated

### 5.1 How to report

To raise an allegation or concern under this section of the policy, please, submit your report in writing to [Whistleblowing@peoplecert.org](mailto:Whistleblowing@peoplecert.org) or [Quality@peoplecert.org](mailto:Quality@peoplecert.org) within two months from the occurrence or discovery of the issue. While we understand that clear evidence may not always be available, it is desirable to include the following information to aid our investigation:

- A clear description of your concern and/or the incident, including relevant circumstances, subject matter, a rough timeline of events, locations (where applicable), and any individuals or entities involved, outlining the actions that gave rise to your concern.
- Supporting evidence related to the incident, such as correspondence with the party involved or us, screenshots, documents, photographs, or any other relevant material.
- Information on whether this is an isolated incident or if there have been other similar occurrences involving the same party.
- Full name and information regarding the nature/status of your relationship with the reported party.
- Your preference for anonymity, specifying whether you would like to remain anonymous in our communications with the reported party.

### 5.2 Investigation Process

Once a concern is raised, we have a duty to investigate the matter thoroughly, even if the whistleblower later wishes to withdraw their consent. Regulatory requirements mandate us to follow up on all allegations of malpractice or maladministration or other serious misconduct.

Depending on the nature of the allegation, we will assign an investigator within the appropriate training and impartiality who has no prior involvement or personal interest in the case. The investigator may contact the whistleblower as needed to gather and confirm the details of the concern.

The investigator will follow our internal procedures to establish the facts. Due to confidentiality and legal requirements, we will not disclose all details of the investigation, including any actions taken against those involved. We also expect the whistleblower to keep any information about the investigation confidential.

### 5.3 Outcomes of Investigation

If the investigation substantiates the allegation, demonstrating evidence of malpractice, maladministration, or other forms of serious misconduct, we will take action against the relevant parties in accordance with the arrangements in our Malpractice and Maladministration policy and, where necessary, our Sanctions policy.

If the allegation is not substantiated, no action will be taken against the whistleblower, provided they did not knowingly raise a false claim.

If, however, the investigation concludes that the whistleblower raised a false allegation maliciously, we reserve the right to take any legal or disciplinary action.

PeopleCert may not disclose the investigation outcomes, nor will disclose to the whistleblower the actions taken or the sanctions imposed, due to confidentiality and legal requirements.



E-mail: [info@peoplecert.org](mailto:info@peoplecert.org), [www.peoplecert.org](http://www.peoplecert.org)

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