

# Whistleblowing Policy

## 1 Introduction

### 1.1 Purpose

The purpose of this policy is to provide all employees with the guideline and processes necessary to disclose information confidentially.

### 1.2 Scope

The law provides protection for workers who raise legitimate concerns about specified matters, called “qualifying disclosures”. Qualifying disclosures are disclosures of information where the worker reasonably believes (and it is in the public interest) that one or more of the following matters is either happening, has taken place, 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 attempt to conceal any of the above

Personal grievances, such as bullying, harassment or discrimination, aren’t usually covered by whistleblowing law, unless your particular case is in the public interest. These would normally be handled through our **Grievance-Policy** or speak to your line manager or a member of the People.

### 1.3 Responsibilities

#### Employee

- Raise any concerns in line with the procedure and principles of this policy

#### Manager

- Ensure that any concerns raised are taken seriously
- Support Investigators to conduct a thorough investigation and make an objective assessment of the concern
- Keep the individual advised of progress
- Ensure action is taken to resolve the concern

### HR Admin Team

- Ensure that any concerns raised are taken seriously
- Escalate any concerns to an appropriate manager / Company Secretary and Group Legal Director

### Company Secretary and Group Legal Director

- Ensure that any concerns raised are taken seriously
- Support managers to investigate issues relating to whistleblowing
- Ensure that individuals are advised of the progress of their concern
- Report to the Board regarding whistleblowing concerns
- Liaise with the relevant proper authorities as necessary

## 1.4 Definitions

**Whistleblowing** is 'making a disclosure in the public interest' and occurs when a worker raises a concern about danger or illegality that affects others, for example members of the public.

Navex is the third party company which delivers our confidential whistleblowing reporting service, **Ethics Point**. It's free, secure, and available 24/7. They can be contacted on 0800 069 8754 and at: [www.unitestudents.ethicspoint.com](http://www.unitestudents.ethicspoint.com)

## 1.5 References

- **Disciplinary - Policy**
- **Grievance-Policy**
- **Diversity, Equity, Inclusion and Belonging Policy**

### The Employee Assistance Programme (LifeWorks)

LifeWorks provide a 24/7, 365 days a year telephone support line to help all employees who need support. The 24/7 telephone support line from LifeWorks provides access to a range of information and services. They are an independent external organisation, who work to a robust professional code of strict confidentiality.

### How do I access it?

- Employees can call: 0800 169 1920 - 24 hours a day, 7 days a week, 365 days a year.

- Outside of UK employees can call: +44 141 533 8293 (calls from abroad will be charged).
- Employees can access online via an employee's LifeWorks account at <https://unite.lifeworks.com/feed>. You will need your individual LifeWorks username and password to log in.
- You can also download the LifeWorks app, just search 'LifeWorks'
- If you need more information about this policy or need support in using it, please contact your line manager or the HR Admin Team.

## 2 Policy

### 2.1 Intent

Whistleblowing is 'making a disclosure in the public interest' and occurs when a worker raises a concern about danger or illegality that affects others, for example members of the public. The disclosure may be about the alleged wrongful conduct of the employer, a colleague, client, or any third party. Personal complaints such as harassment or discrimination are not usually treated as whistleblowing and should be handled through the Grievance policy.

### 2.2 Reporting Your Concerns

- We encourage you to discuss any concerns in the first instance with your line manager. They will be able to provide you with advice and guidance on whether the issue needs to be escalated and if so what the next steps are, as well as providing you with any personal support that you may require.
- If you feel unable to talk to your line manager, or your issue concerns your line manager, then you can contact your line manager's manager or a member of the HR Business Partner team.
- Alternatively you can contact the Company Secretary and Group Legal Director, Christopher Szpojnarowicz, to discuss the matter in confidence with him.
- If you are not comfortable with any of the above three options, we also provide a completely independent, confidential reporting service. This is provided by a company called Navex. This phone service and web reporting is available 24 hours a day and allows you to report your issue anonymously if you wish.

### 2.3 Investigation

Describe the business outcomes if the objectives are met. This gives an indication of what business activity should look like once the policy has been embedded into organisation and its culture.

1. Managers who receive any such concerns should assess whether or not an investigation is required. For instance, the concern may arise from a misunderstanding or misinterpretation of an individual's actions and once clarified, the issue may be resolved.
2. Where it is decided that an investigation should be conducted, the manager should then decide who the investigating manager should be and whether or not referral to an external body is required.
3. The manager should keep the individual who has raised the concern informed of their initial assessment and actions, including referral for investigation.
4. The timeframe for completing an investigation will vary depending on the complexity of the concern raised. However investigating managers should endeavour to investigate matters quickly to ensure any wrongdoing is dealt with promptly.
5. Investigating managers should report back on their findings using the standard investigation report template, which can be found in the HR Policy Toolkit on the Intranet. They should also ensure that the individual who raised the concern is provided with feedback on the outcome of the investigation. It may however not be possible to disclose all details, for example where there are data protection or other sensitive issues.

If, on conclusion of the above stages, you reasonably believe that the appropriate action has not been taken, you should report the matter to the proper authority.

### 2.4 Principles

- Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the individual who raised the issue
- No employee will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the worker will not be prejudiced because he/she has raised a legitimate concern
- Victimisation of an employee for raising a qualified disclosure or retaliation towards them will be treated as a disciplinary offence

- If misconduct is discovered as a result of any investigation under this procedure the Company's disciplinary procedure will be used, in addition to any appropriate external measures
- Maliciously making a false allegation will be treated as a disciplinary offence
- An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, employees should report the matter to the HR Admin team or the Company Secretary and Group Legal Director, Christopher Szpojnarowicz