



## **Whistleblowing Policy**

### **Purpose and Scope**

The Places for People Group is committed to ensuring that, as an employee, you are able to raise concerns you may have about the Group or serious malpractice associated with it.

This policy has been drawn up to ensure you raise these concerns properly and to ensure that mechanisms exist whereby any issues you do raise can be addressed quickly and effectively. The policy also sets out the legitimate course of action which you may take to raise issues with parties outside the Group in exceptional circumstances.

The objective of the Whistle-Blowing policy is to prevent malpractice by encouraging a culture of openness. Employees who are concerned about victimisation or detriment, such as a risk to job security as a result of raising a concern are protected by law if they raise their concerns the right way. Provided you are acting in good faith and reasonably believe in the alleged wrongdoing, you will not suffer any detriment even if your concern proves to be unfounded.

This policy and procedure is applicable to all Group employees.

The Human Resources Department at Group Support Centre will be pleased to advise you about the implementation of the Whistle- Blowing policy and procedure, if you have any questions.

### **Disclosure of Information**

If you believe there is anything the Group should know about, relating to the matters below, then you should use the procedure outlined in this policy:

- Criminal offence
- Breach of a legal obligation
- Miscarriage of justice
- Danger to health and safety of an individual
- Damage to the environment
- Financial malpractice
- Deliberate concealment of information relating to any of the above

## **Procedure**

### **Raising a concern internally**

#### **Stage 1**

If you have a concern about malpractice, you should, in the first instance, raise it with your line manager. You can do this orally or in writing. The line manager will investigate the issue following the procedure set out below. The line manager will inform the relevant Group Director.

If you feel unable to raise the matter with your line manager, you should raise the matter directly with the relevant Group Director, who will investigate the issue following the procedure set out below.

#### **Stage 2**

If you still have continuing concerns following the response at Stage 1, or the matter is so serious you feel you cannot raise it with any of the above, you should prepare a written statement detailing your concerns. This should be forwarded with the line manager and/or the Group Director's response, if appropriate, to the Group Chief Executive.

### **How the Group will respond**

When the concern is raised, you may be asked how you think the matter might best be resolved. If you have any personal interest in the matter, you must declare this at the outset. If your concern falls more properly within the Grievance Procedure, you will be informed of this at the earliest possible time.

The investigation will involve making enquiries to ascertain the relevant facts. The decision as to who will make the initial enquiries depends on, amongst other factors, the seriousness of the allegations and the technical knowledge required to make a judgement on any findings.

The Manager informed of the concern initially will write to you to confirm:

- The nature of the concern
- The steps the Group will take to progress the matter
- Who is making further enquiries
- How you can contact the person making the enquiries
- Whether you may be needed to provide further assistance

After initial enquiries are made, the Head of Group Risk and Compliance, working with the person who has carried out the investigation and any other relevant staff members will decide on the appropriate action to take.

If the concern is found to be justified, you will be informed of the action to be taken, the timescale and the person responsible.

If the concern is found not to be justified, you will be informed of the reasons in writing.

Where appropriate, the Group will confirm the response to the initial enquiries to you in writing. It may not be possible to disclose the precise action taken where this would infringe a duty of confidence owed by the Group to another employee or person associated with the Group.

The Group Head of Corporate Assurance will maintain a log indicating what concerns have been raised, by whom, when and the result of any investigations.

### **If you are dissatisfied**

If you are unhappy with the outcome or the manner in which your concern is managed, you may inform the Group Head of HR or the Group Chief Executive in writing or orally, who will then decide the best course of action.

### **Raising a concern with the Group Board**

The Group is committed to dealing quickly and effectively with concerns raised through this procedure. It is intended that this policy gives employees the reassurance needed to raise such matters following the procedure above, in confidence that information given will be treated appropriately and a response given as soon as possible. However, the Group would rather that any matter of concern is raised than not at all.

Providing you are acting in good faith and have evidence to back up any concerns, and after taking it to the Group Head of HR and the Group Chief Executive, you may put your case in writing to the Senior Independent Non Executive Director.

### **Confidentiality**

All employees have a duty of confidentiality to the Group. When considering making a disclosure of confidential information, you should seek guidance from the Human Resources Department at Group support Centre.

If you ask for a matter to be treated in confidence the Group, will where possible, respect such a request.

### **Raising a Concern Externally (Exceptional Cases)**

The purpose of this policy is to provide the opportunity and protection for you to raise concerns internally. The Group would expect that in almost all cases raising concerns internally would be the most appropriate course of action.

However, if you honestly believe the information and allegations are true but cannot raise them internally, your concerns may be raised with an external body. In order to still be protected by the whistle blowing legislation a disclosure made, other than to the Group, must be made to an appropriate

professional body. For further advice you should contact the Advisory, Conciliation and Arbitration Service (ACAS) or the Department of Trade and Industry.

### **Representation**

You are entitled to be accompanied by a work colleague or trade union representative at any meeting to discuss your concerns, at any stage of the procedure.

### **Disciplinary Action**

If it becomes clear that you have not invoked the procedure in good faith, but for example, for malicious reasons or to pursue a personal grudge, this will constitute misconduct and will be dealt with in accordance with the Group's Disciplinary Procedure.

### **Referral**

There may be matters that cannot be dealt with internally and external authorities will need to become involved. Should this become necessary the Group reserves the right to make such a referral without your consent.

### **Independent Advice**

For independent advice at any stage of the procedure, you may contact any of the following:

- Unison, the officially recognised union.
- The independent charity Public Concern at Work on 020 7404 6609
- Another union, if you are a member
- ACAS Helpline 08457 474747