

Whistleblowing Policy & Procedure

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Introduction

At PeoplePlus we encourage openness and we aim to encourage all colleagues to raise issues which concern them at work and in the provision of our service delivery. PeoplePlus understands that colleagues may be worried about raising a concern and that by doing so they will be opening themselves up to detrimental treatment or risking their job security.

Legislation¹ provides protection for colleagues who raise legitimate concerns about specified matters. These are called 'qualifying disclosures'. A qualifying disclosure is one that is made 'in the public interest' by a colleague who has a reasonable belief that:

- a criminal offence;
- a miscarriage of justice;
- an act creating risk to health and safety;
- an act causing damage to the environment;
- a breach of any other legal obligation; or
- concealment of any of the above;

is being, has been, or is likely to be committed. It is not necessary for the colleague to have proof that such an act is being, has been, or is likely to be committed; a reasonable belief is sufficient.

A colleague who makes such a protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimised because such a disclosure has been made.

This policy applies to all employees of PeoplePlus regardless of role and location. Its provisions extend to those working on our behalf, both within the UK and internationally. Failure to adhere to this and associated policies, will lead to disciplinary proceedings up to and including dismissal.

PeoplePlus affords the same protection to all its colleagues under its policies and procedures.

PeoplePlus encourages all colleagues to raise their concerns under the associated Whistleblowing procedure in the first instance. If a colleague is not sure whether a concern would be considered a 'protected disclosure' then advice may be obtained independently from **Safecall**.

Commitment

PeoplePlus is committed to the highest possible standards of openness, honesty and accountability. To achieve this, the Executive Team and Leaders encourage freedom to raise concerns in the right manner.

It is expected that all colleagues who may have serious concerns about any aspects of PeoplePlus' work should raise them using the correct processes. It is recognised that whistleblowing may need to proceed on a confidential basis and processes have been developed to deal with this.

An important aspect of accountability and transparency is providing a mechanism by which all colleagues who suspect or are aware of any serious malpractice or wrongdoing within the organisation can voice their concerns internally without fear of reprisal or adverse consequence. By encouraging a culture of openness within our organisation, PeoplePlus is committed to addressing any malpractice that might arise within the business.

PeoplePlus is also committed to ensuring full compliance with its obligations and the rights of all employees at PeoplePlus, under the Public Interest Disclosure Act 1998 (amended by the Enterprise and Regulatory Reform Act 2013).

PeoplePlus Management affords the same internal protection to all its workers through its policies and procedures, in that they shall not suffer from harassment, victimisation or any other detriment due to raising a concern.

Important Information

- Employee complaints about their own personal circumstances should be raised using the PeoplePlus Grievance Policy & Procedure, which is available via the Hub.
- Safeguarding concerns should not be raised through whistleblowing. All safeguarding issues must be raised confidentially through the Designated Safeguarding Officer's email Safeguarding@peopleplus.co.uk
- Colleagues should inform their line manager or the Health and Safety team immediately of any incidents or safety concerns.
- If you do want to raise concerns about malpractice within the organisation then you should follow the whistleblowing procedure associated with this policy.

Malpractice

If there are matters which colleagues think PeoplePlus should know about, they should report it in line with this policy and procedure. By knowing about malpractice at an early stage PeoplePlus stands a good chance of taking the necessary steps to safeguard the interests of colleagues and the general public. In short, colleagues should not hesitate to let us know about genuine concerns.

The kinds of malpractice covered by this policy are:

- falsification of records;
- inappropriate use of external funding;
- possible fraud, theft or corruption;
- a criminal offence or a breach of law that has been committed, is being committed, or is likely to be committed;
- leaking confidential information in respect of PeoplePlus activities and/or records;
- damage, or likely damage to the environment;
- deliberately concealing information regarding any of the above matters.

Not commenting on such activity is, in itself, the wrong thing to do.

¹ **Legislation** relating to 'protected disclosures' (later amended to 'qualifying disclosures') was inserted into part IVa of the Employment Rights Act 1996 by the Public Interest Disclosure Act 1998 (amended by the Enterprise and Regulatory Reform Act 2013).

Responsibilities

The PeoplePlus Executive Team will:

- Provide whistleblowing reporting routes for all workers to report concerns, as detailed in the associated procedure.
- Ensure that we are continuously updating our practices with the most recent information and guidance.

Managers will ensure that:

- All workers are aware of this policy and the associated whistleblowing reporting procedure.
- Support is given to any worker who reports a genuine concern under this policy.
- Protection is given against any detriment to any worker raising a genuine concern.

Colleagues:

- Should be aware of this policy and know how to raise genuine concerns under this policy relating to instances of malpractice should they need to do so (see associated procedure for further examples of malpractice).

PeoplePlus Assurances to Colleagues

- If you raise a genuine concern under this policy, believing that the information that you are disclosing is true and in the public interest, you will not be at risk of losing your job or suffering any form of retribution, detrimental treatment or negative or adverse consequences as a result, even if you are mistaken. You must, however, reasonably believe that the information that you have tends to show some malpractice.
- PeoplePlus will not tolerate the harassment or victimisation of anyone raising a genuine concern and we consider it a disciplinary matter to victimise anyone who has raised a genuine concern.
- If you ask us to keep your identity confidential, we will not disclose your identity without your consent, unless required by law. However, if you do not tell us who you are, it may be much more difficult for us to investigate the matter, protect your position or to give you feedback.

Confidentiality

We will maintain strictest confidentiality when dealing with any concerns raised in accordance with the confidentiality section in the Data Protection Framework Policy. Where a request for confidentiality is made during the whistleblowing process, an individual's data will not be divulged without permission unless there is a legal reason to do so. This will be explained to you at the point that you request confidentiality.



This procedure does not form part of any employee's contract of employment and it may be amended at any time. We may also vary this procedure, including any time limits, as appropriate in any case.

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This policy will be reviewed annually and may be amended or withdrawn at the Company's discretion.

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