

| | | | | | | |
|-------------------|-------|----------------|-----------------------|-------------|-----------|--|
| Document Ref | QP068 | Document Title | Whistleblowing Policy | | | |
| Owning Department | HR | Effective Date | 08-Feb-23 | Review Date | 08-Feb-24 | |

1. Purpose

We are committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards. See [HR002 Code of Conduct](#). However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

The aims of this policy are:

- To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- To provide staff with guidance as to how to raise those concerns.
- To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. L&Ps Commitment

L&P will:

- ensure there is a simple, straightforward route for staff to raise concerns about wrongdoing at L&P and set out this process clearly.
- protect staff who blow the whistle and maintain confidentiality – so those reporting wrongdoing can do so without fear of reprisals or detriment to themselves.
- treat all reports of wrongdoing fairly and with care and take each one seriously.
- promptly review and, where appropriate, thoroughly investigate reports of wrongdoing, taking action and seeking to put things right.
- keep its Whistleblowing Policy and associated arrangements under review and update them periodically.

These commitments are underpinned by the protection afforded to whistleblowers under the law (the [Public Interest Disclosure Act 1998](#)).

L&P expects its staff to act openly and honestly in reporting concerns proactively whether they be for wrongdoing or attempted wrongdoing.

L&P wants to instil confidence in our whistleblowing procedure so that everyone feels able, and is encouraged, to blow the whistle. We want to promote confidence more widely in L&P and our work by ensuring we act and are seen to act with honesty and integrity.

3. Scope

This policy covers all employees, officers, consultants, contractors, interns, work experience, casual workers and agency workers.

Personal grievances for example, bullying, harassment and discrimination, are not covered by whistleblowing law or this policy, unless the particular case is in the public interest. In those cases you should use [HR020 Grievance Procedure](#).

If you are uncertain whether something is within the scope of this policy you should seek advice from the Director of People and Talent, HR.

4. Responsibilities

- The L&P Board has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.
- The Director of People and Talent, HR has day-to-day operational responsibility for this policy, and must ensure that all managers and other staff who may deal with concerns or investigations under this policy receive appropriate training.
- The Director of People and Talent, HR, in conjunction with the L&P Board should regularly review this policy from a legal and operational perspective.
- All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing.

5. Process

5.1. What is Whistleblowing

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- criminal activity e.g. fraud or bribery
- libelous activity
- failure to comply with any legal obligation
- miscarriages of justice
- danger to health and safety e.g. where someone's health and safety is in danger
- damage to the environment
- bribery
- facilitating tax evasion
- financial fraud or mismanagement
- the deliberate concealment of any of the above matters.

5.2. What is a Whistleblower

A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy.

If you are uncertain whether something is within the scope of this policy you should seek advice from the Director of People and Talent, HR.

6. Process

You can either raise a concern internally or, if you would prefer, you can use our external service provider (see 6.4 below).

6.1. Confidentiality

We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible.

We hope that staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially this can be done using the SeeHearSpeakUp platform; which is our external service provider.

6.2. Raising a Whistleblowing Concern Internally

We hope that in many cases you will be able to raise any concerns with your line manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively.

If you do not feel comfortable reporting your concern to your line manager, for example, because you have concerns about her or his involvement, then you can report it directly to the Director of People and Talent, HR.

Where the matter is more serious, or you feel that your line manager has not addressed your concern, you should contact one of the following either verbally or in writing:

- Director of People and Talent, HR
- Managing Director, Strategy & Operations
- CEO

However you raise your concern, it will be acknowledged within 3 calendar days.

A log will be maintained for auditing purposes.

We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

We will take down a written summary of your concern and provide you with a copy of the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

We will provide formal feedback within 3 months. This will include details on what happened or what will happen as a result of your disclosure.

For anyone investigating your concern to know your identity, we will discuss this with you.

6.3. Investigation and Outcome

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

In some cases we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of repeat incidences taking place.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If we conclude that a whistleblower has made false allegations maliciously, the whistleblower will be subject to [disciplinary action](#).

6.4. Raising a Whistleblowing Concern Externally

If you would prefer to raise your concern externally, we have engaged SeeHearSpeakUp as L&P's third-party confidential whistleblowing service. For more details on who they are and how to use this service, please see the [SeeHearSpeakUp Staff QA](#).

6.5. If You Are Not Satisfied

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.

If you are not happy with the way in which your concern has been handled, you can raise it with either the Director of People and Talent, HR, Managing Director, Strategy & Operations or the CEO. Alternatively, you may contact the [chairman of the L&P Board](#).

6.6. External Disclosures

The aim of this policy is to provide a mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert an external body e.g. a regulator.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator ([click here for link to government website](#)).

It will very rarely, if ever, be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external.

Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service. In some circumstances, the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first. You should contact your line manager or one of the other individuals mentioned in section 6.2 for guidance.

6.7. Protection and Support for Whistleblowers

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Director of People and Talent, HR immediately. If the matter is not remedied you should raise it formally using [HR020 Grievance Procedure](#).

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action.

7. Change History

- Added new reporting platform – SeeHearSpeakUp
- Removed duplication

8. Training Requirements

All employees to be made aware of this procedure

9. Appendices

None