



Whistle-blowing Policy

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Document control

Review Date	Version	Amendments made	Author
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Dec 24	2.0	Reviewed and amended with minor re-wording of Sections 1 and 4 for clarity and Ireland legislation changes	ACM
May 25	2.1	New policy drafted following changes to the Company's ownership	SB

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Background

PeoplePlus Group Limited (“PeoplePlus” or “the Company”) is committed to conducting its business in an honest and ethical manner at all times and to creating a culture that promotes transparency and accountability. However all organisations, including PeoplePlus, are exposed to the risk of things going wrong, either unintentionally or through deliberate acts on the part of individuals.

So-called ‘whistle-blowing’ is a process by which individuals can raise legitimate concerns about certain forms of wrongdoing while enjoying certain protections against reprisals (e.g. discrimination, victimisation or harassment) by either the company or individuals for having done so.

In the UK, the main pieces of law in this area are the Public Interest Disclosure Act 1998 and the Enterprise and Regulatory Reform Act 2013. These Acts establish legal safeguards for workers (including trainees and agency workers) who report, in good faith, legitimate concerns about:

- Criminal activity such as bribery, fraud, tax evasion, money laundering or modern slavery offences;
- Other breaches of the law, such as failure to comply with National Living Wage regulations or Right to Work rules;
- Threats to health and safety;
- Actual or potential damage to the environment;
- Miscarriage/perversion of criminal or civil justice; or
- Concealment of wrongdoing.

Whilst it is not specifically provided for in the Acts, many organisations extend this list to include serious breaches of organisational policies and PeoplePlus has adopted a similar position.

Concerns may relate to past, current or possible future incidents or events that have affected, or may affect, persons other than the individual raising the concern, which makes their disclosure in the public interest. Typically, this might be fellow employees or the wider public.

It is important that it is clearly understood that whistle-blowing is separate and distinct from processes for dealing with complaints and grievances that relate to an individual’s personal circumstances as these do not meet the ‘public interest’ criterion.

Sources of further information and relevant links are set out in Appendix II.

Purpose and Scope

This policy document sets out the Company’s commitment to protecting the interests of individuals who, in good faith, raise legitimate concerns about known or suspected wrongdoing within PeoplePlus. It also provides guidance on how to report concerns and explains how these will be investigated.

The policy applies to all parts of PeoplePlus regardless of the jurisdiction in which they are legally registered and/or operate and to all employees working for, or providing services to,



any part of the Company regardless of their position within the organisation. This includes permanent, fixed-term and temporary contractors, seconded staff, trainees, interns, consultants, agency staff, homeworkers, casual workers, volunteers, agents, sponsors and any other person associated with the Company.

This policy should be read in conjunction with other policies such as the Anti-Fraud Policy, Anti-Bribery Policy and Conflicts of Interest Policy and relevant policies.

Policy Statement

It is the Company's policy to encourage individuals with legitimate concerns about wrongdoing within PeoplePlus to raise these concerns secure in the knowledge that the concerns will be taken seriously and that they are protected against reprisals, even if the concerns prove to be unfounded.

As an integral part of this, PeoplePlus is committed to promoting awareness of whistle-blowing, to putting in place appropriate and accessible reporting channels by which concerns can be raised (anonymously if required) and to investigating thoroughly all reports made via these channels. Should a criminal offence or other breach of laws or regulations be identified as a result of such investigations, this will be reported to external agencies such as the police where this is a legal requirement, or it is appropriate to do so.

PeoplePlus will take a zero-tolerance approach to reprisals against whistle-blowers and such behaviour may lead to action under the Disciplinary Policy, as defined from time to time.

Overview of Whistleblowing

Definition

Whistle-blowing is the disclosure in good faith of information relating to known or suspected wrongdoing or dangers at work. Most day-to-day concerns should be resolvable by escalation to line management or via internal grievance/complaints processes. However, where the nature of the concern is such that it meets the definitions and standards outlined in this policy, or management are closely involved in the situation, the whistle-blowing process provides a way to raise genuine and reasonable concerns.

A genuine concern relating to a matter covered by relevant laws or company policies is referred to as a 'qualifying disclosure' in the UK. For the avoidance of doubt, the whistle-blowing process applies only to matters falling within the categories set out in Section 1 above. It is not intended to be used to question operational or financial decisions taken by the Company, nor to revisit matters already covered by disciplinary, grievance or similar processes.

Specific situations, such as safeguarding issues in relation to children and young people, may be covered by separate reporting and escalation processes and should not usually be raised through the whistle-blowing process unless there is a legitimate public interest aspect.

Confidentiality and Anonymity

All whistle-blowing reports will be treated as confidential. The identity of the whistle-blower will be known only to those individuals who receive the initial report and will only be shared with those charged with investigating the concerns raised. If it becomes clear that the identity of



the whistle-blower must be shared with others to ensure that any investigation is efficient and effective, the whistle-blower's consent will be sought.

Whistle-blowing concerns may be raised anonymously, but this may hamper investigations and will prevent feedback to the whistle-blower. Whilst all reports will be considered objectively, anonymous reports may be deemed less credible.

Any potential whistle-blower who has concerns about safeguarding their confidentiality should seek advice from the People/HR Team or an external source such as the whistle-blowing charity Protect (see Appendix II), which provides advice free of charge.

Investigations and Outcomes

Concerns raised through the whistle-blowing process will go through an initial assessment to determine the nature and scope of the appropriate response. Provided the report was not made anonymously, the whistle-blower may be asked to provide clarification of certain details or further information. If the matter raised does not qualify as a legitimate public interest disclosure it may be diverted to a more appropriate process e.g. grievance process.

It may be necessary and appropriate to appoint an investigator or team of investigators with experience of investigations and/or specialist knowledge of the subject matter to ensure that concerns are fully investigated and appropriate recommendations for change are made to enable PeoplePlus to minimise the risk of future wrongdoing.

Whistle-blowers will be kept informed of the progress of investigations if they have so requested, but commercial and/or personal confidentiality considerations may prevent the sharing of specific details including any disciplinary action to be taken against individuals as a result of investigations.

As a general principle, no decision to seek external legal advice on matters raised via the whistle-blowing process or to report such matters to external agencies should be taken without prior approval from a PeoplePlus Executive Team Director.

Protection for Whistle-blowers

The relevant laws in the UK provide whistle-blowers with protection from detrimental treatment as a result of raising a concern in good faith. Such detrimental treatment might include threats, victimisation, harassment, discrimination in relation to pay rises or promotions or even dismissal. However, where a clear whistle-blowing policy has been defined and communicated employees are required to follow it to claim these protections.

Any whistle-blower who feels they are suffering detrimental treatment as a result of having raised a concern via the defined process should immediately raise the matter with the People Team. Any PeoplePlus employee found to have engaged in such conduct may be subject to disciplinary action. If the situation is not satisfactorily remedied, the Grievance Policy should be followed.

External Disclosures

The law recognises that in certain circumstances it may be appropriate to report concerns to an external regulator, or even the media (it is unlikely that this will ever be appropriate if the procedures outlined in this policy are followed). As most whistle-blowing concerns are likely to relate to PeoplePlus employees, or to PeoplePlus as a company, reporting such concerns internally first and/or seeking advice from organisations such as Protect (see Appendix II) is strongly encouraged.



In some circumstances the law will protect whistle-blowers who raise concerns about a client, supplier or other third party with that third party directly. However, reporting such concerns internally within PeoplePlus first is strongly encouraged.

NOTE: For the purposes of this policy the Safecall whistle-blowing hotline (see Section 5 – Making a Whistle-blowing Report below) is considered an internal reporting channel.

False Allegations

The protections afforded to whistle-blowers apply only if concerns are raised in good faith. If an allegation is found to have been made maliciously or with a view to personal gain they do not apply and the whistle-blower in such cases may be subject to disciplinary action under the relevant policies in place at that time.

Making a Whistle-blowing Report

As noted above, employees should always consider raising concerns with their line manager or line director in the first instance, making clear that they wish to have the matter treated as a whistle-blowing issue.

If this is not possible or appropriate, employees should follow the process set out in Appendix I.

PeoplePlus provides a confidential whistle-blowing hotline via Safecall, an independent call handling service through which reports can be made, anonymously if preferred. Reports are relayed to a small group of senior managers within the relevant division who are responsible for ensuring that all reports are investigated thoroughly. Links to further information about Safecall can be found in Appendix II.

Responsibility and Accountability Framework

The Company's Executive Team, via divisional senior management, is responsible for promoting a culture of ethical behaviour, transparency and accountability across the Company and encouraging employees to raise legitimate concerns. It does this by:

- Defining and communicating clear policy statements setting out the Company's position in relation to matters such as fraud, bribery, tax evasion, money laundering and competition;
- Providing employees with appropriate training and guidance on these policies and how they should be implemented and providing the means by which legitimate concerns about these and other matters can be raised;
- Putting in place risk-based preventative measures that are proportionate to the PeoplePlus business and exposure to risk; and
- Allocating sufficient and appropriate resources to implement policies effectively and ensure compliance.

Line managers are responsible for:

- Ensuring that their teams are aware of the provisions of this policy and the importance of raising concerns in accordance with the defined process; and



- Ensuring that all reports made under this policy are dealt with in accordance with the procedures set out in this policy document and appendices; and
- Respecting whistle-blowers' confidentiality and ensuring that they do not suffer any form of recrimination as a result of making a whistle-blowing report.

Recipients of whistle-blowing reports and those charged with investigating such reports are responsible for:

- Acting promptly to ensure that reports are investigated thoroughly while taking appropriate steps to protect the confidentiality of the whistle-blower;
- Objectively assessing information assembled during investigations and reporting findings and any recommendations that arise to senior management quickly and concisely; and
- Reviewing this policy and any supporting procedures or guidelines as required by legal, regulatory or contractual considerations or otherwise at least annually and proposing amendments for consideration by the Board.

All employees (as defined in Section 2 – Purpose and Scope above) are responsible for:

- Reading this policy and ensuring clear understanding of its contents;
- Complying with the requirements of the policy; and
- Reporting genuine concerns through the appropriate channels and in accordance with the procedures set out in this policy document and appendices.

Practical Implementation of This Policy

If clarification of any aspect of this policy is required, advice should be sought from Assurance/Finance teams or the Chief Financial Officer.

It may occasionally be necessary to issue interpretations of various provisions of this policy or guidance in respect of items not covered as unanticipated facts and circumstances arise that are not specifically addressed in this document. Any such interpretations shall be in writing and shall be approved by the Chief Executive Officer and the Chief Financial Officer.

Links to further information and other relevant documents are provided in Appendix I.

Policy Review

This policy shall be subject to review at least annually.

If you would like any of our policies in any other format such as another language, Braille or large print, or if you have a question about the policy, please email peoplesupport@peopleplus.co.uk for assistance



Appendix I – Reporting Concerns

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**.

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.

To raise a Whistleblowing concern you should speak with your line manager within the first instance, if you're unable to raise this with your line manager then you should raise this with their line manager or the Divisional Director. If you are unable to raise the Whistleblowing concern with your line manager, their line manager or the Divisional Director then this should be raised via the People Team or Safecall.



Appendix II – Further information and Contact Details

Sources of Advice and Further information

People Team	peoplesupport@peopleplus.co.uk
AVIVA Employee Assistance Programme Confidential counselling hotline available 24/7	0800 404 9452
Protect Independent whistle-blowing charity providing free confidential advice	0203 117 2520 whistle@protect-advice.org.uk https://protect-advice.org.uk

Whistle-blowing Hotline

Safecall Independent reporting hotline available 24/7	0191 516 7720 https://www.safecall.co.uk
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