



Whistleblowing Policy

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Responsible	People Development	
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1. Purpose and scope

- 1.1 The policy applies to all employees within the Group. It is important to the Group that any fraud, misconduct or wrongdoing by employees is reported and properly dealt with. The Group encourages all employees to raise any concerns that they may have about the conduct of others or the way in which the business is run. The policy sets out the way in which employees may raise any concerns that they have and how those concerns will be dealt with.

2. Definition of whistleblowing

- 2.1 The law provides protection for employees who raise legitimate concerns about specified matters. These are called "qualifying disclosures". A qualifying disclosure is one made in the public interest by the employee who has a reasonable belief that one of the below is being, has been, or is likely to be, committed:
- a criminal offence;
 - a miscarriage of justice;
 - an act creating risk to health and safety;
 - an act causing damage to the environment;
 - failure to comply with legal information;
 - concealment of any of the above
- 2.2 These acts can be in the past, present or future so that, for example, a disclose qualifies if it relates to environmental damage that has happened, is happening or is likely to happen. The Group takes concerns relating to the above matters very seriously. The employee does not necessarily need proof that such an act is being, has been, or is likely to be, committed, a reasonable belief is sufficient.
- 2.3 The Group encourages employees to raise their concerns under this procedure in the first instance. If an employee is not sure whether to raise a concern, they should discuss the issue with their line manager, People Development or Managing Director.

3. Principles

- 3.1 All employees should be aware of the importance of preventing and eliminating wrongdoing. Employees should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.
- 3.2 An employee who makes such a protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimised, because they have made a disclosure.

This means that the continued employment and opportunities for future promotion or training of the employee will not be prejudiced because they have raised a legitimate concern.

- 3.3 This procedure is for disclosures about matters other than a breach of an employee's own contract of employment. If an employee is concerned that their own contract has been, or is likely to be, broken, they should use the Group's Grievance Procedure.

4. Harassment or victimisation

- 4.1 The Group is committed to good practice and raising high standards in a supportive environment. The Group recognises that the decision to report a concern can be a difficult one to make.
- 4.2 The Group will not tolerate any harassment or victimisation and will take appropriate action to protect the employee raising a concern in good faith and will treat this as a serious disciplinary offence which will be dealt with in accordance with the Group's Disciplinary Policy.

5. Procedure

- 5.1 The Group will respond to concerns as soon as possible. In the first instance, the employee should report any concerns with their line manager. Where the concern relates to their line manager, or it is not appropriate to make the report to their line manager, the employee should report this to People Development. All concerns reported will be treated in the utmost confidence. The employee may be asked to confirm any verbal concerns in writing or to confirm a written record of a verbal report and the employee will need to provide the following information:
- The nature of the concern and why the employee believes it to be the true;
 - The background history of the concern submitting relevant dates.
- 5.2 The employee is not expected to prove beyond doubt the truth of their suspicion. The employee will need to demonstrate to their manager that they have a genuine concern relating to suspected wrongdoing or malpractice and there are reasonable grounds for concern.
- 5.3 Following receipt of a disclosure, the line manager will arrange an investigation meeting into the matter, unless the concern relates to the employee's line manager, in which case it will be conducted by another manager. The investigation meeting will take place within ten days following receipt of the disclosure and may involve meeting with the

employee and other employees involved. The purpose of the investigation meeting's is to gather as much information as possible from the employee regarding their concerns, including whether they have any supporting evidence or witness statements.

- 5.4 The manager who carried out the investigation will then report to the Managing Director, which will take any necessary action, including reporting the matter to the proper authority. The legislation sets out a number of bodies to which qualifying disclosures may be made (see section 7).
- 5.5 If disciplinary action is required, the matter will be referred to People Development to commence the Group Disciplinary Procedure. On conclusion of any investigation, the employee will be informed in writing the outcome of the investigation and what the Managing Director has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained.
- 5.6 If the employee is not satisfied with the explanation or outcome, they may raise the matter with the appropriate official organisation or regulatory body. Alternatively, employees may raise a formal complaint under the Group's Grievance Procedure.

6. Formal action

- 6.1 Should formal action be required as a result of any disclosure made under this policy, this action will be carried out in accordance with the applicable internal policy. Any potential sanctions imposed will be fair and reasonable and in line with the relevant policy.

7. Authority reporting

- 7.1 The employee has a right to report the matter to the proper authority should they believe that the appropriate action has not been taken by the Group, (see list on [GOV.UK](https://www.gov.uk)).

8. Confidentiality

- 8.1 All concerns will be treated in confidence and every effort will be made not to reveal the employees identify if that is their wish. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of the employee's disclosure without their help, so the employee may be asked to come forward as a witness. If the employee agrees they will be offered support and advice.

9. Data Protection

- 9.1 The Group will process any personal data collected in accordance with the Group's Data Protection Policy. Data collected from the point at which the employee makes the report is held securely and accessed by, and disclosed to, employees only for the purposes of dealing with the disclosure.

10. Failure to comply

- 10.1 Victimisation of an employee for raising a qualified disclosure will be a disciplinary offence. If misconduct is discovered as a result of any investigation under this procedure, the Group's disciplinary procedure will be used, in addition to any appropriate external measures. Maliciously making a false allegation is also a disciplinary offence. An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, employees should not agree to remain silent. They should report the matter to the Managing Director or People Development.

11. Equality, diversity and inclusion

- 11.1 CPL Group is an equal opportunity employer. This is not only a legal requirement underpinned by the Equality Act 2010 but is also a commitment from the Group. As an employer, we embrace equality, diversity and inclusion (EDI) and seek to ensure that our policies are free from unlawful or unfair discrimination and underpin the Group's values.