

## **EWG-HR-P-021 - Whistleblowing Policy**

Eric Wright Group Ltd and all subsidiary companies

**June 2022**

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## Revision History

Version	Date	Revision Author	Summary of Changes
1	June 13	HR Manager	Implementation of new policy
2	August 17	HR Manager	General review - update EAP details
3	June 22	Group Head of People	General review

## Approval

<b>Jeremy Hartley</b> <b>Managing Director</b> <b>Eric Wright Group</b>	Signed   Date: 29 <sup>th</sup> June 2022	 <b>ERIC WRIGHT</b> <b>GROUP</b>
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## 1. Introduction

The purpose of this Policy is to ensure that there is a fair, systematic and legally compliant approach to Whistleblowing and that this approach is applied consistently across the EWG businesses.

### Scope

This Policy applies to EWG businesses, their employees, and workers including agency personnel, client personnel, consultants, or sub-contractors.

### Responsibilities

The functional responsibility for the development, review, and maintenance of this Policy rests with the Group Head of People who is also responsible for retaining records of the amendments made to this Policy.

The Group Head of People is responsible for ensuring that this Policy is properly and consistently applied across all EWG businesses and for providing assistance and guidance to employees as appropriate.

Line Managers/Supervisors are responsible for understanding and subsequently following the procedure accordingly.

The Management Board is responsible for approving amendments to this Policy.

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## 2. Corporate Statement

We are committed to conducting our business with honesty and integrity, and we expect all employees to maintain high standards. 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 or to address them when they do occur.

### The aims of this policy are:

to encourage employees 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 employees with guidance as to how to raise those concerns.

to reassure employees that they should be able to raise genuine concerns in good faith 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 it may be amended at any time.

### Who is covered by this Policy?

This Policy applies to all individuals working at all levels of the organisation, including senior managers, officers, directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term workers, casual and agency staff (collectively referred to as employees in this policy).

### What is Whistleblowing?

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

- criminal activity
- miscarriages of justice
- concern about the safeguarding of a child, young person or vulnerable adult
- concern about the behaviour of a person who works with children, young people or vulnerable adults
- danger to health and safety
- damage to the environment
- failure to comply with any legal or professional obligation or regulatory requirements
- bribery
- financial fraud or mismanagement
- negligence
- unauthorised disclosure of confidential information
- the deliberate concealment of any of the above matters.

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.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Procedure or Anti-harassment and Bullying Policy as appropriate.

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If you are uncertain whether something is within the scope of this policy you should seek advice from the Whistleblowing Officer (Nicola Parkinson, Group Head of People) or the independent organisation – Protect, formally known as (Public Concern At Work) both of whose contact details are at the end of this policy.

## Raising a Whistleblowing Concern

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. In some cases, they may refer the matter to the Whistleblowing Officer.

However, where the matter is more serious, or you feel that your Line Manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact the Whistleblowing Officer.

Where the matter relates to safeguarding of children, young people, or vulnerable adults you should contact the Whistleblowing Officer immediately. In addition, should the concern relate to a child at an education facility, as well as following the above procedure, you **MUST** also inform the local nominated safeguarding representative immediately.

You will be asked to complete a Whistleblowing Form detailing your concerns. 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 after the meeting. We will also aim to give you an indication of how we propose to deal with the matter where it is appropriate to do so.

## Confidentiality

We hope that employees will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

We do not encourage employees 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 and have been made in good faith. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowing Officer and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt, you can seek advice from Protect, the independent whistleblowing charity, who offers a confidential helpline. Their contact details are at the end of this policy.

## External Disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

However, should the concern relate to a child at an education facility, in addition to following the above procedure, you **MUST** also inform the local nominated safeguarding representative immediately. In cases relating to safeguarding, the Whistleblowing Officer will instigate communications with relevant external parties, e.g., Head Teachers.

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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. 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. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

Whistleblowing concerns usually relate to the conduct of our employees, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. The law allows you to raise a concern with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, we encourage you to report such concerns internally first. You should contact your Line Manager or the Whistleblowing Officer for guidance. Where the concerns relate to safeguarding, you must contact the Whistleblowing Officer in the first instance.

## 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, where it is appropriate to do so. 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 employees 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 future wrongdoing.

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, in bad faith or with a view to personal gain, the whistleblower will be subject to disciplinary action.

## 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 the Deputy Chairman of the Board of Directors. Contact details are set out at the end of this policy.

## Protection and Support for Whistleblowers

It is understandable that whistle-blowers 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.

Employees must not suffer any detrimental treatment because 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 Whistleblowing Officer immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

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Employees must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

## Contacts

### Whistleblowing Officer

Nicola Parkinson, Group Head of People

01772 694695

07581 024609

[nparkinson@ericwright.co.uk](mailto:nparkinson@ericwright.co.uk)

### Deputy Chairman

Jim Carter

01772 694731

07850 870785

[jimc@ericwright.co.uk](mailto:jimc@ericwright.co.uk)

### Employee Assistance Helpline

Lifeworks

0800 048 2702

[www.unumuk.lifeworks.com](http://www.unumuk.lifeworks.com)

### Protect

<https://protect-advice.org.uk/contact-protect-advice-line>

### (Independent Whistleblowing Charity)

020 3117 2520

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## EWG-HR-F-025 – Whistleblowing Form

Please use this form (EWG-HR-F-025) to report any serious concerns that you may have over malpractice or wrongdoing occurring in the Eric Wright Group, including but not limited to:

- Financial Malpractice or impropriety or fraud
- Failure to comply with a legal obligation or statutes
- Danger to health and safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour, including matters relating to safeguarding of children, young people or vulnerable adults
- Attempts to conceal any of these

The above may either involve Eric Wright Group employees, sub-contractors or other related individuals/organisations.

<b>Who is the allegation against?</b>  <b>Please provide name and Company</b> <i>(if known)</i>		
<b>What is the allegation?</b>		
<b>Where is this happening and is it still happening?</b>		
<b>What evidence can you give to support this?</b> <i>(please provide further details)</i>		
<b>Have you reported this previously?</b> <i>(✓ as appropriate)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>If you have reported this previously, who and when did you report it?</b>		
<b>Any further information to add?</b>		

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<b>Do you wish to remain anonymous?</b> (✓ as appropriate)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>If no, please provide your contact details.</b>	<b>Name:</b>	
	<b>Address:</b>	
	<b>Contact Number:</b>	
	<b>Email:</b>	

**Please return this form in confidence to:-**

Group Head of People, Whistleblowing Officer  
Eric Wright Group Ltd, Sceptre House, Sceptre Way, Bamber Bridge, Preston, Lancashire, PR5 6AW

### Privacy Notice

In completing this form, you are providing to us personal information about yourself. This information is personal data and under the General Data Protection Regulation in force from 25 May 2018 we are obliged to hold this data securely protected against unauthorised or unlawful processing, accidental loss, destruction or damage and only for so long as is necessary to deal with your relationship or contract with us. We do not share the information we hold with anyone else apart from where it is necessary for financial or insurance purposes or required for our legitimate interests. Personal data may be shared with companies within the Eric Wright Group of companies of which we are part. We may also be required by law to pass some of the information to government departments, local authorities and law enforcement agencies. We confirm that we will not disclose the personal data to third parties other than as mentioned above without your consent. You may contact us at any time to ask what personal data we are holding, why we are holding it, how you can access it and to check that we are meeting our data protection obligations. Such requests should be made to the Data Protection Coordinator at Eric Wright Group, Sceptre House, Sceptre Way, Bamber Bridge, Preston. PR5 6AW. If you are unhappy with the way we hold your information or deal with your request to access it you have the right to lodge a complaint with the Information Commissioner who is the supervisory authority for the United Kingdom and may be contacted at <https://ico.org.uk/concerns> or by telephone on 0303 123 1113

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