

Whistleblowing Policy

Summary

- We're committed to the highest possible standards of openness, integrity and accountability and encourage all colleagues to raise serious concerns without fear of reprisal or victimisation.
- Whistleblowing is reporting certain types of wrongdoing such as fraud or malpractice because you believe it is in the public interest to do so.
- If you raise a concern that is in the public interest, you cannot be victimised, given a formal warning, dismissed or suffer any other detriment just because you have raised the issue.
- You may want to use the form designed for raising a whistleblowing concern, which is available on the intranet, but you don't have to.
- The PPF will process any personal data in accordance with GDPR and the data protection policy. All records will be destroyed in line with requirements under GDPR.

Introduction

We're committed to the highest possible standards of openness, integrity and accountability and encourage all colleagues to 'blow the whistle' on any wrongdoing without fear of reprisal or victimisation.

This policy aims to make sure you:

- feel confident about raising concerns about wrongdoing and about questioning and acting upon your concerns
- know there are appropriate avenues to raise your concerns and receive feedback on any action taken
- are given a response to your concerns and are aware of how to continue pursuing the matter if you aren't satisfied with that response, and
- feel reassured you will be protected from reprisal or victimisation if it is reasonable for you to believe that your concerns are genuine.

This policy sets out:

- the procedure you should use to raise an issue
- who to raise the issue with, and
- how we will investigate.

This policy covers all colleagues including employees, agency workers, secondees, interns, contractors and consultants. It also applies to suppliers and members of the public.

This policy records managerial processes. It does not form part of your contract of employment. The policy may be amended from time to time at the PPF's discretion.

The detail

What is whistleblowing?

Whistleblowing is reporting certain types of wrongdoing such as fraud or malpractice because you believe it is in the public interest to do so.

The sorts of issues raised under this policy include:

Examples of concerns which could be raised	
You suspect someone's health and safety is in danger.	A criminal offence e.g. theft, bribery, fraud or corruption.
You're worried about the professional practice or competence of a colleague.	How others are being treated e.g. bullying or harassment.
Risk of or actual damage to the environment.	Failure to comply with the law.
A miscarriage of justice.	You believe someone is covering up wrongdoing.
Malicious compromising of data.	

Principles

- You don't need proof. All you need to do is to raise the issue as a genuine concern.
- You don't have to investigate. It is our responsibility to do that.
- It may be something that has already happened, or is happening now, or you believe it is likely to happen in the future.
- It does not have to be in the UK. You can 'blow the whistle' on something happening outside the UK.
- You must act reasonably. Making a deliberately false or malicious allegation is a serious matter and disciplinary action may be taken against you.

Your protection

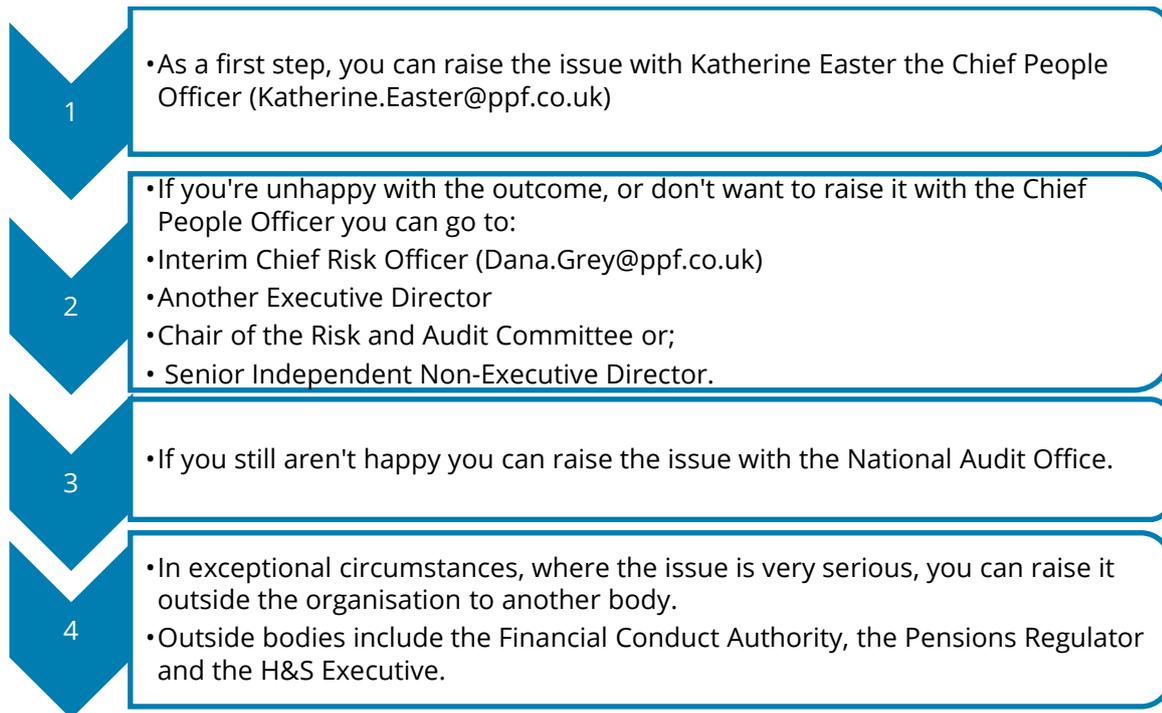
If you raise a concern that is in the public interest, you cannot be victimised, given a formal warning, dismissed or suffer any other detriment because you have raised the issue. This is known as *protection against a disclosure made in the public interest*.

The process

You can raise the issue verbally, in writing, or by email. You may want to use the form designed for raising a whistleblowing concern, which is available on the intranet, but you don't have to.

If you wish to remain anonymous, then you can raise the issue by putting an unsigned written note in a plain envelope. No attempts will be made to determine who the anonymous whistleblower is.

Due to the size of our organisation we don't have an external whistleblowing reporting service. In most instances, whistleblowing investigations will be led or supported by the HR team to ensure confidentiality is maintained.



Contact details

Title	Name	Contact
Chief People Officer	Katherine Easter	Katherine.Easter@ppf.co.uk
Other executive and non-executive directors:		
Chief Executive Officer	Oliver Morley	Oliver.Morley@ppf.co.uk
Chief Customer Officer	Sara Protheroe	Sara.Protheroe@ppf.co.uk
Interim Chief Risk Officer	Dana Grey	Dana.Grey@ppf.co.uk
General Counsel	David Taylor	David.Taylor@ppf.co.uk
Chair of Risk and Audit Committee	Chris Cheetham	chrisscheetham@ntlworld.com
Senior Independent Non Executive Director	Chris Cheetham	chrisscheetham@ntlworld.com
National Audit Office	https://www.nao.org.uk/contact-us/whistleblowing-disclosures/	
Other bodies include:		
Financial Conduct Authority	http://www.fca.org.uk/site-info/contact	
The Pensions Regulator	https://www.thepensionsregulator.gov.uk/en/contact-us/whistleblowing-contact-us	
H&S Executive	http://www.hse.gov.uk/contact/index.htm	

Investigation

You should raise your concerns as soon as possible. Delaying could allow the incident to happen again or make it more difficult to investigate.

When raising a concern, try to include as much information as possible on the nature of the concern, when it happened, who was involved, the background and reasons for the concern. If you have already raised this as a concern, please confirm who this was raised with and the response received.

The investigator – the person or organisation who you raise your concern with – will carry out a thorough, timely investigation, while maintaining confidentiality as far as possible. An appropriate investigator will carry out a thorough investigation.

You'll be kept informed of the progress of the investigation, and given feedback on the outcome and how to appeal. The investigator may need to maintain confidentiality, so feedback might be general rather than specific.

We'll act on the investigation's findings where appropriate. If any misconduct is discovered, our disciplinary procedure and any appropriate external proceedings may be used to address the issue.

Data Protection

The PPF will process any personal data collected via the investigation in accordance with the data protection policy. Data collected from the point at which you raise the concern is held securely, accessed by and disclosed to, individuals only for the purposes of dealing with the concerns raised as part of the investigation.

Monitoring

The Director of HR and OD will provide a report to the Risk and Audit Committee detailing the numbers of concerns raised under the Whistleblowing Policy, and any action taken.

Related documents/additional guidance

Public Concern at Work is a whistleblowing organisation <http://www.pcaw.org.uk/> that provides a confidential free telephone advice service, to people who witness wrongdoing at work but aren't sure if or how to raise their concern.

<https://www.gov.uk/whistleblowing/what-is-a-whistleblower>

Document control

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Approved by	Katherine Easter, Chief People Officer

