

SPEAK OUT POLICY

VERSION 2.6

**DOCUMENT OWNER & AUTHOR
SELENA PRITCHARD**

WESLEYAN
we are all about you

DOCUMENT CONTROL SHEET

Contact(s) for Enquiries and Proposed Changes

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Document Tier

Tier	1
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Document Review History

Version	Version Date	Revised By	Detail of amendment
1.7	June 2018	ER Team/Company Secretarial	Re-written to simplify and make more reader friendly
1.8	January 2019	Company Secretarial	Updated name of Company Secretary & Caroline Hill's job title
1.9	February 2019	Risk & Governance Consultant	Incorporated feedback from Partnership Council. Included Related Policies section.
2.0	June 2020	Company Secretary	No material changes
2.1	September 2020	Company Secretary	Amended to replace Caroline Hill with Lisa Perkins and to make clearer that the policy can be used by outsource suppliers prior to publication on our website
2.2	June 2021	Company Secretary	Amended to replace Roger Dix with Jonathan Welsh. Amendments made to incorporate the introduction of the Group Harassment and Anti Bullying Policy as well as the FCA campaign to raise awareness.
2.3	September 2021	Company Secretary	Included feedback from the Partnership Council and the Group Operating Environment Committee.
2.4	March 2022	Company Secretary	Added Jeevan Virk to the panel of representatives (removed Naheem Ahmed)
2.5	May 2022	Company Secretary	Amended to add explanation of Speak Out to 'Our Aim' and addition of threat to life or property to 'What is not Covered'. Additional policies added to 'Related Policies'.
2.6	June 2023	Company Secretary	Added Consumer Duty and updated Employee Assistance details

Document Reviewers (Wesleyan unless specified)

Name	Title	Comments
Lisa Perkins	HR Director	Rights to waive anonymity included & link to relevant HR policies.
Selena Pritchard	Company Secretary	Central record requirements included
Partners of the Partnership Council	Various	Policy review & feedback
Group Operating Environment Committee	Various	Policy review & feedback

Document Sign Off – SMF

Name	Role	Date
PGPRC	Sub Committee of GEM	June 2019
Audit Committee	Sub Committee of the Board	June 2019
Audit Committee	Sub Committee of the Board	September 2019
Audit Committee	Sub Committee of the Board	June 2020
Audit Committee	Sub Committee of the Board	June 2021
Audit Committee	Sub Committee of the Board	September 2021

Committee Noted

Version	Committee	Notes/Caveats	Date
2.5	Group Operating Environment Committee		June 2022
2.6	Audit Committee		June 2023

Next review due

Frequency	Annual or upon significant change	Next review date	June 2024
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1. Introduction

Our aim

Our aim is to act responsibly to help ensure our colleagues and customers feel safe in the knowledge that Wesleyan welcomes and listens to all concerns that may relate to serious misconduct. We wish to encourage an environment where colleagues feel able to openly discuss concerns.

In spite of our aim to conduct our business with fairness and integrity, there may be occasions where you feel that our values, policies or code of conduct have been violated. If you observe or suspect such misconduct, you are encouraged to speak out. This will give the Wesleyan Group a chance to deal with this issue. By speaking out you are preventing the situation from getting missed or worsening and helps ensure we meet the requirements of the Consumer Duty regulations to help ensure good outcomes for customers.

We want all our employees and external stakeholders (such as our suppliers) to work in an environment that's open, safe, legally compliant, built around the principle of delivering good outcomes for customers and to be confident that any serious concerns of unethical or unlawful activity that are raised will be investigated and dealt with quickly and fairly.

The purpose of the Speak Out Policy (also known as 'Whistleblowing') is to provide a safe framework for all colleagues. This means that colleagues can confidently raise issues through the Speak Out process without the concern of repercussion. Any allegation of recrimination will be taken very seriously, and anyone found to have taken recriminating actions against a whistle-blower will be subject to disciplinary procedures. This is considered Gross Misconduct which could lead to dismissal.

2. Scope

Who is covered

This policy applies to all Wesleyan employees (and ex-employees), including subsidiary company employees, employees at companies to which we outsource our operations and any agency workers or contractors who are engaged by the business and who have grounds for believing that misconduct or malpractice has occurred, is occurring or is likely to occur in connection with our business, whether on the part of another employee or any other person. This means that concerns would usually be serious by nature and it is likely that the business activities would cause actual or potential harm to colleagues or our customers. Use of the term 'colleagues/employees' in this document refers to all those covered under the policy as described above.

What is covered

For Wesleyan, this could include:

- ▶ Misconduct of colleagues that deviates from the Wesleyan's accepted behaviours that harms or is likely to harm the reputation or financial well-being of the Wesleyan, which also includes potential harm to our customers
- ▶ Misconduct of colleagues subject to FCA Conduct rules
- ▶ Serious breaches of FCA, PRA regulations and any other legislation that applies to Wesleyan, including Consumer Duty

- ▶ Deliberate or malicious breaches of Wesleyan's policies or procedures
- ▶ Engaging in bribery or fraudulent activity
- ▶ Conflicts of Interest

Other examples, could include:

- ▶ a criminal offence
- ▶ a failure to comply with a legal obligation
- ▶ a miscarriage of justice
- ▶ putting the health and safety of an individual in danger

What isn't covered

Personal grievances (for example harassment or bullying are not specifically covered by whistleblowing law, unless it is in the public interest. Wesleyan have specific Grievance and Anti Bullying and Harassment policies in place to address these concerns and these should still be reported via the relevant channels (HR policies).

This policy should not be used to report any concerns that may present an immediate threat to life or property. If the concern is urgent or life threatening it should be raised to the emergency services without delay.

All HR policies can be located via the Company Controls Documentation Guide on the intranet and within WesPeople.

3. Reporting Concerns

What to do if you have a concern

If you have witnessed wrongdoing in the workplace, you can tell us your concerns with confidence. We will take the time to listen and understand your concerns. We can arrange to speak with you or meet you in person, and we will protect your identity throughout.

Who you raise it with will depend on the nature and sensitivity of the concern. Usually, you would raise it with your Line Manager, but we recognise that in some instances you may not feel able to discuss your concern with them.

Alternatively, you can therefore raise your concerns directly, to any of the following Speak Out Representatives, either in writing, by calling or emailing:

		
<p>Jonathan Welsh Chief Risk Officer jonathan.welsh@wesleyan.co.uk mobile: 07743 894967</p>	<p>Lisa Perkins HR Director lisa.perkins@wesleyan.co.uk mobile: 07785 778338</p>	<p>Robert Ralph Head of Internal Audit robert.ralph@wesleyan.co.uk mobile: 07824 351474</p>
		
<p>Selena Pritchard Company Secretary selena.pritchard@wesleyan.co.uk mobile: 07534 013385</p>	<p>Gary Dixon Society Audit Committee Chair gary.dixon@wesleyan.co.uk</p>	<p>Jeevan Gosal Partnership Council Chair jeevan.gosal@wesleyan.co.uk</p>

☎ Alternatively, if you would like to speak anonymously to someone external to the company, you can contact [Safecall](#), an independent third party.

0800 915 1571
Available **24 hours a day, 7 days a week.**

What to consider

If you are considering making a report, you may be nervous and have questions about what will happen next. We understand that making a report isn't something that is done lightly and that a lot may have happened before you have considered taking this step. There are several additional resources that are available to help support you in your decision.

- speaking with the whistleblowing charity Protect
- taking time to understand more about the legal protections given to whistle-blowers through the Public Interest Disclosure Act
- Safecall, an independent third party, who can be contacted on 0800 915 1571 and are available 24 hours a day, 7 days a week.
- familiarise yourself with the process 'what will happen if you raise a concern'

You may also contact the Bupa Employee Assistance Programme (EAP) which is a free, confidential helpline either by phone or online.



You can also disclose a concern directly to the regulators, Financial Conduct Authority (FCA) or to the Prudential Regulation Authority (PRA) for any wrongdoing related to prudential regulation issues. The FCA and PRA are the prescribed bodies for concerns about the conduct of funds, markets, firms and individuals subject to the Financial Services and Markets Act including investment or insurance businesses and mutual societies.

The FCA can be contacted on:

call: 0207 066 9200
email: whistle@fca.org.uk
web-form: [Contact us | FCA](#)
write to: Intelligence Department (Ref PIDA), Financial Conduct Authority,
12 Endeavour Square London, E20 1JN

The FCA also provides support to Whistle-blowers. Details of the service they provide can be found on their [Whistleblowing | FCA](#)

The PRA can be contacted on:

call: 0203 461 8703
email: whistleblowing@bankofengland.co.uk

write to: Confidential Reporting (Whistleblowing), IAWB team, Legal Directorate, Bank of England, Threadneedle Street, London, EC2R 8AH.

Further details can be found on their website [Whistleblowing and the Prudential Regulation Authority | Bank of England](#)

What will happen if you raise a concern

All reports will be submitted to **Gary Dixon**, who is the Group's designated Whistleblowing Champion. The role as a Whistleblowing Champion is to oversee the integrity, independence, and effectiveness of internal whistleblowing arrangements, including those intended to protect whistle-blowers from recrimination.

Once a concern or disclosure has been raised (Appendix B), the Speak Out Champion will then arrange for the matter to be investigated further and they will also contact the Group Chief Executive (CEO), or the Chair of the Society as appropriate and the investigation by a designated (independent) person(s) will begin.

Your identity will be kept anonymous at this stage unless we have your agreement to disclose it or:

- ▶ Where the designated person(s) is under a legal obligation to do so;
- ▶ The matter has become public knowledge;
- ▶ On a strictly confidential basis to a solicitor for the purposes of obtaining legal advice.

You shall not be required to take part in any enquiry or investigation by us unless you consent, unless we have reason to believe that you are involved in misconduct or malpractice. Where you take part in any enquiry or investigation this will be on an open basis, but the designated person(s) will use his or her best endeavours to ensure that confidentiality is respected.

Please note that if you 'speak up' about issues that fall under the Grievance Policy or Anti Bullying and Harassment Policy, it may be necessary for you to waive your right to anonymity for us to carry out further investigations.

Any documents including files, CCTV computer files or copies of emails or telephone records in relation to the matter shall be kept by the designated person(s) in a secure place and only the designated person(s) shall have access to them.

Where possible, the designated person(s) will arrange to formally meet you to obtain detailed information regarding the alleged malpractice and to advise you of further steps to be taken. Where possible, this meeting will be held within 5 working days of receiving the issues you have raised. You may be accompanied at such a meeting by a fellow employee, trade union official or Staff Association member of your choice.

- ▶ Where you are accompanied by a fellow employee, trade union official or Staff Association representative you will be responsible for ensuring that your companion keeps the matter strictly confidential unless required by law or until the matter becomes public knowledge.

As soon as practicable after the disclosure or meeting has taken place the designated person(s) will recommend further action where appropriate. Such recommendation may include one or more of the following:

- ▶ Carry out a further detailed internal investigation or arrange for an appropriate third party (e.g. FCA) to carry out an external investigation;
- ▶ Inform the appropriate authority – for example, FCA, Health and Safety Executive;
- ▶ Inform the Police.

The designated person(s) will not recommend further action if they are:

- ▶ Not satisfied that you have a reasonable belief that malpractice has occurred, is occurring or is likely to occur; or
- ▶ Not satisfied that you are acting in good faith; or
- ▶ The matter raised is already the subject of legal action or has been referred to the police or appropriate authority; or
- ▶ The matter is already the subject of other Employer investigations.

Any recommendations by the designated person(s) will be discussed with the Whistleblowing Champion. They will also be discussed with the Group CEO and/or Chair without disclosing your identity, if you have requested anonymity. The Group CEO and/or Chair will ensure that the recommendations are implemented.

Once the recommendations have been agreed you will be advised of this in writing by the designated person(s). If it is decided that no action is to be taken you will be informed of the reasons for this in writing. Where reasonably practicable, the designated person(s) will respond in writing within 10 working days of the meeting.

After discussion with the CEO, the designated person(s) will be responsible for contacting the appropriate authority or Police to inform them of the malpractice if appropriate.

The Company Secretary maintains a central record of any report received and must be kept informed of any occurrences (regardless of outcome).

What if you don't feel your concerns have been addressed?

If you're unhappy about our handling of your concerns or the outcome of any subsequent actions we may take, or you believe you will be or have been subjected to unfair treatment because of the disclosure, you may raise the matter confidentially with the Speak Out Champion or with the Society Chair, Nathan Moss.

You may at this stage disclose the matter to a solicitor of your choice for the purpose of taking legal advice, if you have reasonable grounds to believe that:

- ▶ The designated person (s) was/were involved in the alleged malpractice;
- ▶ The designated person(s) has/have not investigated the matter thoroughly;
- ▶ You disagree with the conclusion;
- ▶ You will be or have been subjected to detriment as a result of making the disclosure.

4. Our commitment to protect you

The Public Interest Disclosure Act (PIDA) 1998 and the Enterprise and Regulatory Reform Act 2013 give general statutory protection against recrimination and/or dismissal to employees, agency staff and external suppliers who choose to raise concerns about their employer's misconduct (this is known as a 'protected disclosure'), where they have a reasonable belief that this would be in the public interest.

We wish to emphasise that you will not be subjected to adverse repercussions from raising your concern. There is an assumption that all disclosures are made in good faith and once raised will be taken seriously. All colleagues are encouraged to speak out about anything they see or hear as outlined in the Policy.

We will make every effort to ensure that you don't suffer any detriment because of the disclosure of information under this policy. Any allegation of recrimination will be taken very seriously and anyone found to have taken recriminating actions against a whistle-blower will be subject to disciplinary procedures. This is considered Gross Misconduct which could lead to dismissal.

Periodic checks and reviews of our policy and process will be undertaken to ensure our systems and controls remain effective. These reviews will:

- ▶ Draw upon relevant resources prepared by whistleblowing charities, our regulators or other recognised standards setting organisations; include consultation with our colleagues; and
- ▶ Review the policy and its effectiveness, reported to the Wesleyan Audit Committee annually.

5. Policy administration

Related policies

- ▶ Grievance Policy
- ▶ Diversity and Inclusion Policy
- ▶ Anti-Bullying & Harassment Policy
- ▶ Transitioning at Work Policy
- ▶ Disciplinary Policy
- ▶ Employee Conduct Policy (which includes our Ethical Code)
- ▶ Conflicts of Interest and Anti-Bribery Policy
- ▶ Personal Account Dealing Policy
- ▶ Financial Crime Policy
- ▶ Anti-Money Laundering and Countering Terrorist Financing Policy
- ▶ Appendix A – Manager Guide
- ▶ Appendix B – Record of Speak Out Report

Policy Stakeholders

Any material changes to this policy should be communicated to the following audiences. For any policy changes that require global distribution the support of the Internal Communications team should be sought.

- ▶ Company Secretary
- ▶ Group Operating Environment Committee
- ▶ Audit Committee

Overall compliance mechanism

Compliance with this Strategy and Policy will be achieved through the monitoring of compliance with the processes established to implement it.

Speak Out Policy monitoring and reporting is the responsibility of the Company Secretary, the Whistleblowing Champion and the Audit Committee. Breaches should be reported to Company Secretary.

The following should be available on request as evidence of policy adherence:

- ▶ Record of Speak Out Reports

APPENDIX A – Manager guide

 Managers should recognise whether the issue is a grievance or a disclosure and advise as appropriate. The employee reporting a concern must reasonably believe the disclosure relates to past, present or likely future wrongdoing.

As a manager your team member will discuss matters with you on a daily basis and may confide in you about an act or concern about unethical or unlawful activity and/ or a concern that we are not delivering good outcomes for customers. You have a responsibility to recognise and acknowledge this information and act accordingly, whether this be escalation, recognising a potential ‘whistleblowing’ offence or following up on a disclosure via the right channels (other Policies).

All reports, whether formal or not must still be reported to the:
Company.secretary@wesleyan.co.uk to ensure Wesleyan maintains appropriate records.

A Manager’s Role

- ▶ Listen carefully and respect the employee’s belief
- ▶ Keep an open mind (it does not mean you are ‘bad’ manager if they were not aware of the issue)
- ▶ Respond and reassure
- ▶ Respect confidentiality – but explain limitations
- ▶ Offer support (and consider the support available as appropriate i.e. Occupational Health, EAP etc.)
- ▶ Assess the facts
- ▶ Consider whether the concern/disclosure falls within the Anti-Bullying and Harassment Policy or Grievance Policy (or other relevant HR policy)
- ▶ Protected Disclosure -Tends to be about unlawful activities, malpractice or serious wrongdoing such as dangerous or criminal activity which affects others
- ▶ Decide the way forward
- ▶ Follow the Speak Out Policy
- ▶ Maintain good communication with the employee and keep up to date with progress
- ▶ Act fairly
- ▶ Seek advice and support from HR, or individuals as per the section ‘Reporting Concerns’ in the Speak Out Policy
- ▶ Keep clear records
- ▶ Follow up agreed actions and keep the individual up to date
- ▶ Complete Appendix B and submit to the Company Secretary in all cases

 Contact [Company Secretary](#) or the [Speak Out Champion](#) if you need further guidance and/or;

 [Safecall](#) an independent third party, who can be contacted on **0800 915 1571** and are **available 24 hours a day, 7 days a week.**

APPENDIX B – Record of Speak Out Report

To ensure compliance with the Speak Out Policy and record keeping requirements, a central record is maintained by the Company Secretary and should capture instances and outcomes. This template should be completed to capture any instances of an individual ‘speaking out’ and actions carried out.

Please complete the following and return to the <i>Whistleblowing Champion</i>	
1) Date of notification:	
2) Method:	
3) Notified to:	
4) Individual’s name, role, department, manager:	
5) Overview of incident/issue(s): <i>(continue overleaf required)</i>	
6) Describe next steps... <i>(continue overleaf required)</i>	

Please complete the following and return to the <i>Whistleblowing Champion</i>	
7) Outcome (including date)	
Additional information <i>(if required), include Section number these notes relate to:</i>	
8. Feedback to individual:	<i>There is a require for the individual who has 'spoke out' to be kept informed of decisions, actions and outcomes.</i>