

WHISTLEBLOWING POLICY

VERSION 2.7

DOCUMENT OWNER & AUTHOR
SELENA PRITCHARD

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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
2.7	August 2024	Company Secretary	Renamed Whistleblowing to make clear this relates to protected disclosures

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
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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
2.7	Audit Committee, GOEC, Partnership Council		September 2024

Next review due

Frequency	Annual or upon significant change	Next review date	August 2025
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1. Introduction

Our aim and purpose of the policy

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 raise this. This will give the Wesleyan Group a chance to deal with this issue. By raising issues you are preventing the situation from getting missed or worsening and can also help ensure we meet the requirements of the Consumer Duty regulations to ensure good outcomes for customers.

Raising concerns is valued and is a vital component of a healthy culture. We want everyone to feel confident to raise any concerns they have about wrongdoing or misconduct in the course of their work without fear of retaliation. 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 Whistleblowing Policy (formerly known as Speak Out ‘’) is to provide a safe framework for all colleagues. This means that colleagues can confidently raise issues through the whistleblowing 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 by the Policy?

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 types of concerns should be reported through the Whistleblowing Policy?

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/actual 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, data protection and competition laws

- ▶ Breaches of financial accounting or auditing requirements
- ▶ Deliberate or malicious breaches of Wesleyan's policies or procedures including relating to misselling, sexual harassment or any form of discrimination related to race (including colour, nationality, or ethnic origin), age, sex, gender, disability, pregnancy, religion or belief, marital status, sexual orientation, or social condition (Please note that If you experience sexual harassment in your workplace, you can raise it as a grievance or as a whistleblowing concern. Whistleblowing requires there to be a public interest element to your concerns, meaning that the concerns do not just impact you. Sexual harassment reports are often treated as workplace grievances, but if they involve significant implications for the entity or have implications beyond the individual discloser, they can also be protected as whistleblowing disclosures).
- ▶ Engaging in bribery or fraudulent activity
- ▶ Conflicts of Interest

Other examples, could include:

- ▶ A criminal offence, including fraud, theft, or facilitation of slavery
- ▶ A failure to comply with a legal obligation
- ▶ A miscarriage of justice
- ▶ Putting the health and safety of an individual in danger
- ▶ Colleagues dealing inappropriately with their own policy accounts or the policy accounts of others
- ▶ Other risks or dangers at work (such as breaches of IT security or health & safety requirements)
- ▶ Breaches of this policy or the whistleblowing process, including whistleblower detriment
- ▶ Any attempt to conceal any of the above points.

What types of concerns should not be reported through the Whistleblowing Policy?

Depending on the nature of the concern it may be that there is a more appropriate, existing process in place for some issues to be raised. For example:

Personal grievances – there are processes in place for addressing concerns that relate to you personally, these include:

- **Resolving Issues at Work – this is managed and supported by Human Resources (HR):** if you have personal issues relating to your employment (e.g., you think you are being harassed or bullied). Wesleyan have specific [Grievance](#) and [Anti Bullying and Respect](#) at Work policies in place to address these concerns. All HR policies can be located via the Company Controls Documentation Guide on the intranet and within WesPeople.
- **Post Employment Complaint – managed and supported by HR:** if you have personal issues relating to your previous employment with the Society, these should be raised through your former Line Manager in the first instance (or your former line manager's line manager), who can then record a case with HR.
- **Performance Assessment Appeal - through your Line Manager:** if you are dissatisfied with your end of year performance assessment.
- **Redundancy Appeals Process - managed and supported by HR:** if you are dissatisfied with the redundancy process.
- **Customer complaints – refer to a local complaints team, or visit the Wesleyan's dedicated webpage:** [Make a complaint](#) | [Share your feedback](#) | [Wesleyan](#)
- **Financial Crime – if you have suspicions that transactions may be linked to money laundering/financial crime, raise a Suspicious Activity Report or speak to Angela Dunn (Money Laundering Reporting Officer).**

If, however, your concerns relate to financial crime policies or process, these may be raised through the whistleblowing process,

These processes should be used in the first instance. Where you are unsure whether your concerns would be best addressed through this policy or otherwise, please contact a Whistleblowing Representative for advice. All contact is treated confidentially. Alternatively, if you feel comfortable in doing so, you could discuss how best to manage your concerns with your line manager or a manager you trust.

If you have exhausted the alternative process and have concerns in relation to its effectiveness or efficiency, this can be reported through the Whistleblowing Policy. However, any investigation into such concerns would be focused on the overall process rather than any personal or individual matters.

The 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.

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 Whistleblowing Representatives, either in writing, by calling or emailing:

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

 Alternatively, if you would like to speak anonymously to someone external to the company, you can contact Safecall, an independent third party. It is also possible to report an incident to Safecall on their website - 0800 915 1571 Available 24 hours a day, 7 days a week.		

You can raise your concerns: -

Openly, meaning you are not worried about being identified, with a colleague or line manager if you are comfortable discussing your concerns with them; or

Through the dedicated whistleblowing representatives above either: -

Confidentially, meaning your personal details, or any other information from which your identity could be deduced, will not be shared outside of the Whistleblowing process without your permission, unless required for legal purposes; or

Anonymously, meaning you choose not to provide any identifying information within your report, including your name.

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 Bank of England | Bank of England](#)

If a report from a member of staff is raised directly to you, then as the recipient of that report you must: -

- keep confidential any information that may reveal the identity of the whistleblower, or any other person(s) named in the report; and
- send the original disclosure to a Whistleblowing Representative.

What will happen after I raise a concern?

All reports are taken very seriously and 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 retribution.

Once a concern or disclosure has been raised (Appendix B), the Whistleblowing 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 raise issues that fall under the Grievance Policy or Anti Bullying and Respect at Work 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 Whistleblowing 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

All concerns are treated confidentially. Your personal details, or any other information from which your identity could be deduced, will not be shared outside of the Whistleblowing process without your permission, unless required for legal purposes. If provided, your name and contact details will only be known by those involved in managing and investigating your concerns and will remain confidential. Reporting confidentially helps make the investigation process more efficient as it enables investigators to gather further information if needed and engage with you directly via your preferred method of contact. Unless required by law, your identity, or any other information from which your identity could be deduced, will only be disclosed to others (for example, the subject of your concerns and/or your line manager) with your consent.

You also have the option to remain anonymous if you would prefer, meaning you do not need to provide any identifying information, including your name. Specific reporting requirements exist for some countries. These are explained at the time of submitting a report.

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.

If you believe you have suffered any form of retaliation or detriment because of raising a concern you should contact a Whistleblowing Representative in the first instance so that they can provide support and arrange for the matter to be investigated. You have a choice about how your treatment should be investigated, either via the Whistleblowing process, or through the HR Grievance Policy.

5. Policy administration

Related policies

- ▶ Grievance Policy
- ▶ Equality, Diversity and Inclusion Policy
- ▶ Anti-Bullying & Respect at Work Policy
- ▶ Disciplinary Policy
- ▶ Code of Conduct
- ▶ Conflicts of Interest and Anti-Bribery Policy
- ▶ Personal Account Dealing Policy
- ▶ Financial Crime Policy
- ▶ Anti Bribery and Corruption Policy
- ▶ Gifts and Hospitality Policy
- ▶ Market Abuse Policy
- ▶ Anti-Money Laundering and Countering Terrorist Financing Policy
- ▶ Appendix A – Manager Guide
- ▶ Appendix B – Record of Whistleblowing 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.

Whistleblowing 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 Whistleblowing Reports

The Society treats failure to follow the requirements of this policy very seriously and where applicable, in accordance with local policy and laws, may discipline those who do not follow the policy.

Your responsibilities

Employees, and those working on behalf of the Society, must...

- Complete any mandatory reading or training relating to the policy;
- Know how to access the whistleblowing service;

- Report any known or suspected activities or behaviours within the Society of which they become aware, or are made known to them, breach our internal policies and procedures, breach regulatory requirements, or are illegal; and
- Comply with the Society's other policies, when engaging with the whistleblowing process,

Employees, and those working on behalf of Society, must not...

- Undertake any investigations of their own unless formally appointed to do so by a Whistleblowing Representative or a member of an investigations team authorised to conduct investigations by the Whistleblowing Champion;
- Undertake any activities that lead to the identification of anyone suspected or known to be a whistleblower;
- Subject anyone to detriment, dismissal, or any other mistreatment due to them reporting concerns;
- Speculate on or seek to identify the origins of an investigation; and
- Share the identity of a whistleblower without permission.

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 Respect at Work 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 Whistleblowing 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 Whistleblowing 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 [Whistleblowing 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 Whistleblowing Report

To ensure compliance with the Whistleblowing 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.

We take the collection and handling of information seriously and comply with applicable laws, regulations, and guidelines. All information provided will be kept confidential.

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 *Whistleblowing Champion*

7) Outcome (including date)

Additional information (if required), include Section number these notes relate to:

8. Feedback to individual:

There is a require for the individual who has 'spoke out' to be kept informed of decisions, actions and outcomes.