

# Connected\_\_Kerb

Connected Kerb Ltd

The Tapestry Building

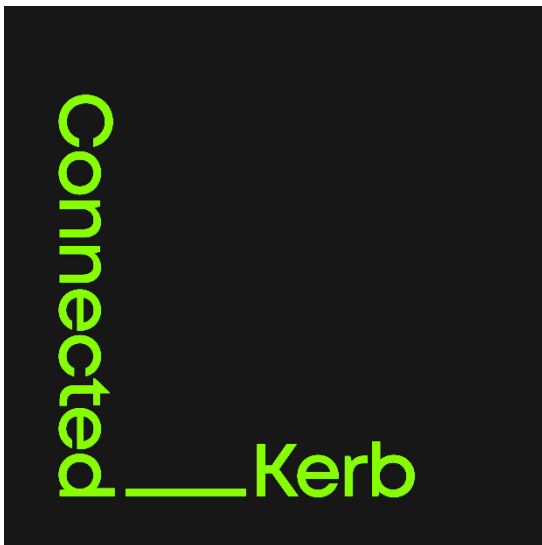
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## WHISTLEBLOWING POLICY



# Connected\_\_Kerb

<b>Name of policy</b>	Whistleblowing Policy
<b>Authorising department</b>	People and Culture
<b>Effective date</b>	1 August 2023
<b>Last review date</b>	N/A
<b>Version number</b>	1
<b>Policy Owner</b>	Cecilia Amis

## Register of amendments

This policy has been created to be in line with current best practice.	01/07/23

## Version Control

Version number	Approved Date	Communication Date	Summary of Changes

## Approval History

Date	Approver	Version
	Board of Directors	1
	Audit and Risk Committee	1

## Executive Summary

The declaration of disclosures of any inappropriate behaviour or practices within the organisation should be raised by workers without fear of any detrimental treatment. The policy sets out what a qualifying disclosure is and gives guidance about what to do if you have concerns and the sanctions that may be imposed for failing to comply with the policy.

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## 1. PURPOSE AND SCOPE

Connected Kerb Ltd are committed to conducting our business with honesty and integrity and we expect all our people to maintain high standards. This policy aims to encourage Connected Kerb 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. Employees who raise genuine concerns should be able to do so without fear of reprisal, even if they are mistaken. We are committed to ensuring that no employee should feel at a disadvantage in raising legitimate concerns.

This policy applies to anyone who works for Connected Kerb or for an independent organisation that provides Connected Kerb services. This includes all employees, consultants, contractors, casual workers, students, volunteers and agency workers. It is underpinned by the UK Public Interest Disclosure Act 1998 (PIDA). PIDA gives legal protection workers against being dismissed or penalised as a result of publicly disclosing certain serious concerns.

This policy does not form part of any employee's contract of employment.

This policy is the responsibility of the Chief People Officer (CPO) and will be regularly reviewed.

### **Associated policies**

Connected Kerb Anti Money Laundering Policy  
Connected Kerb Anti Bullying and Harassment Policy  
Connected Kerb Bribery Policy  
Connected Kerb Environmental Policy  
Connected Kerb Grievance Policy  
Connected Kerb Health and Safety Policy  
Connected Kerb Tax Evasion Policy

## 2. WHAT IS WHISTLEBLOWING?

Whistleblowing is a confidential disclosure by an individual of any concerns, suspected wrongdoing or dangers in relation to Connected Kerb's work or those who work for the Company This includes bribery, facilitation of tax evasion, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment, unauthorised disclosure of confidential information, negligence, improper conduct or unethical behaviour, and any breach of legal or professional obligations. It also includes the deliberate concealment of any of the above matters.

The whistleblowing process assists individuals, who believe they have discovered wrongdoing, to raise a concern, in order that this can be addressed.

As part of your new hire onboarding, you will have completed the Whistleblowing training module, and should be familiar with the concerns you can raise under this policy. Whistleblowing should not be confused with a personal grievance you have about a colleague or Connected Kerb. Please familiarise yourself with this policy and our grievance policy to ensure you are following the correct procedure.

Whistleblowing protects our people, our customers, beneficiaries, investors and Connected Kerb by identifying harm before there are any serious consequences.

## 3. RESPONSIBILITIES

The overall responsibility for implementing the effectiveness of this policy rests with the board of trustees who will be informed periodically by monitoring led by the Audit and Risk Committee.

### Workers

It is the responsibility of all workers to raise any concerns that they might have about malpractice or misconduct within the workplace using the procedure set out below. Everyone, irrespective of their job or seniority, is required not to subject any other employee or worker to any detrimental treatment, nor harass or bully such an individual on the basis that they have raised a concern under this policy. They are also required not to encourage others to do so nor to tolerate such behaviour. Disciplinary action, including dismissal, may be taken against any employee found guilty of such behaviour. In addition, any individual who has victimised a colleague may be personally liable for any such victimisation. It is also the responsibility of all workers to truthfully contribute to and inform any workplace investigations into disclosures.

### Line managers

Line managers are responsible for ensuring that all people are aware of this procedure and their rights and obligations within it. Line managers should encourage a positive open working culture for employees to easily express their concerns and to take those concerns seriously. Line managers are responsible under this policy for receiving disclosures and for ensuring these are referred to the Chief People Officer (CPO) or, where the allegations concern the CPO, to the Chief Executive Officer (CEO).

### People team

People Partners are responsible for supporting the individual making the disclosure (if necessary), ensuring that matters are handled in line with the organisation's policies and procedures and that all reasonable steps are taken to ensure that the individual making the disclosure and any witnesses are protected from recriminations.

### CPO

In a disclosure where the CPO is implicated, the CEO, is responsible for undertaking any whistleblowing investigations or for ensuring the investigation of such investigations by another party such as a trustee or an external investigator as appropriate.

### Board of Trustees

Board of Trustee members of the board of trustees are responsible under this policy for receiving disclosures by exception (for example when the allegations concern the Chief Executive Officer (CEO) and where they do this, for ensuring these are addressed.

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## 4. HOW TO RAISE A CONCERN

A whistle-blower is a person who raises a matter relating to any of the whistleblowing concerns listed above. You should raise a concern if you reasonably believe that what you are raising genuinely falls into the categories listed above.

We hope that in many cases you will be able to raise any concerns with your line manager. Your line manager may be able to agree a way of resolving your concern quickly and effectively or they may refer the matter to Safecall our outsourced whistleblowing hotline provider.

Where you prefer not to raise the matter with your line manager for any reason, you should contact Safecall, Contact details are provided at the end of this policy. Their call handlers and operations managers are experienced and responsive. This service is available 24 hours a day and ensures the confidentiality of the person raising the concern. Once you have reported your concerns, Safecall will notify the CPO at Connected Kerb who, depending on the case, will assign an investigating manager to investigate the matter or assign Safecall to carry out the investigation.

## 5. INVESTIGATION AND OUTCOMES

Depending on the nature of the case, an internal or external investigator with specialist knowledge or experience may be assigned to investigate the matter. The investigating manager may make recommendations on how Connected Kerb can minimise the risk of future wrongdoing. Depending on the nature of the case, external authorities may need to become involved, including the police, Connected Kerb's auditors or another independent body. If this is considered necessary, we may make a referral without obtaining the whistle-blower's consent (though we will only voluntarily share the whistle-blower's personal data with external authorities with their consent).

At the end of any investigation the whistle-blower will be given an explanation about the result and any actions Connected Kerb intends to take within the boundaries of the law and confidentiality. Whistle-blowers and those who are aware of the details are expected to keep any information around a whistleblowing investigation confidential. Broken confidences around the matter will be treated as misconduct in accordance with our Disciplinary Policy.

All managers who receive or investigate whistleblowing allegations are expected to take a positive attitude towards the colleagues who raise these concerns. This includes thanking the colleague for raising the matter and recognising the courage it takes to raise concerns. The colleague should be informed about how their concerns will be addressed and notified when any investigations are completed. Where investigations take several weeks to conclude updates should be provided to the whistleblower to give assurance that the matter is being actively followed up.

The investigating manager will investigate the matter comprehensively. This may involve:

- asking the whistleblower for further information or clarification
- interviewing colleagues and other relevant people
- checking documentation and records, and
- visiting our premises.

They also have the right in serious cases to recommend suspension of the person they are investigating.

Where appropriate we will keep the Chair of the Board up to date with progress.

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The investigating manager will share a closure report with the originating senior manager. The senior manager will refer it to the Senior Leadership Team (SLT) with any recommendations for action. They might also share it with the Board.

## 6. CONFIDENTIALITY

We hope our people will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

However, we do not encourage anonymous whistleblowing disclosures. Proper investigations may be more difficult or impossible if further information or feedback is not forthcoming. It is also more difficult to establish whether allegations are credible. Whistle-blowers who are concerned about possible reprisals if their identity is revealed should inform the Whistleblowing Officer and appropriate measures can then be taken to preserve confidentiality.

If you are in any doubt, you can seek advice from our EAP (Employee Assistance Programme) via Canada Life or [Protect](#), the independent whistleblowing charity, who offer a confidential helpline. Any personal information you provide will be retained for as long as is necessary to investigate and resolve the issue, including putting right any shortcomings discovered and any litigation. It may be retained for longer if it is required to meet legal, regulatory, or contractual obligations but your personal data will be deleted as soon as is required by law.

## 7. EXTERNAL DISCLOSURES

The aim of this policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace.

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. You are strongly encouraged to seek advice before reporting a concern to external bodies, such as the Health & Safety Executive, Environment Agency etc. In the first instance you should raise your concern with Safecall. In addition, [Protect](#) can be called to help you determine whether your concern does fall under this policy. Depending on the circumstances, external disclosures to the press or regulator bodies will not be considered reasonable. They may constitute misconduct and could be treated under our Disciplinary policy.

## 8. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

If it becomes clear that the procedure under this policy has been raised in bad faith (for example, falsely or for malicious reasons or to pursue a personal grudge against another employee), this will constitute misconduct and it will be treated as a disciplinary matter in accordance with our Disciplinary Policy.

You must not threaten or retaliate against whistle-blowers in any way. If you are involved in such conduct, you may be subject to disciplinary action.

Any employee who, in good faith, makes allegations that turn out to be unfounded will not be penalised for being genuinely mistaken. In all cases, the employee is encouraged to follow our whistleblowing procedure. We will support whistle-blowers who raise genuine concerns under this policy, even if they turn out to be mistaken. Whistle-blowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform your line manager or People Partner immediately. If the matter is not remedied, you can raise it formally using our Grievance Procedure.

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## 9. CONTACTS

Whistleblowing Officer	Outsourced to Safecall 0800 915 157
People Partners	Stephanie Robinson Helen Saunders
Chief People Officer	Cecilia Amis
Chief Executive Officer	Chris Pateman Jones
EAP (via Canada Life)	<a href="http://wecare-cl.com">Canada Life (wecare-cl.com)</a> Access code E31150 020 8068 0035
Protect (Independent whistleblowing charity)	Helpline: 0203 117 2520 E-mail: <a href="mailto:whistle@pcaw.co.uk">whistle@pcaw.co.uk</a> Website: <a href="http://www.pcaw.co.uk">www.pcaw.co.uk</a>