

Whistleblowing Policy

G4S Employment Support Services



G4S Employment Support Services Whistleblowing Policy

POLICY AND PROCEDURES FOR WHISTLEBLOWING – FOR G4S STAFF, SUB-CONTRACTOR STAFF AND G4S CUSTOMERS

PURPOSE

- 1.1 G4S Employment Support Services is committed to delivering quality public services according to high standards of ethics, honesty, accountability and openness. This Whistleblowing Policy is in place to encourage G4S Staff, Sub-Contractor Staff and G4S Customers to raise any concerns around malpractice, improper conduct and unethical behaviour of any sort.
- 1.2 G4S Employment Support Services recognises it has a duty to investigate all concerns reported under this policy in order to ensure that there is no risk to the Business or the quality of public services provided by G4S or our supply chain of Sub-Contractors.

POLICY

1.3 Employees of G4S Employment Support Services

- 1.3.1 The Company welcomes employees raising concerns about malpractice, improper conduct and unethical behaviour of any sort, as well as any attempts to conceal such behaviour within Provider Organisations and the whole supply chain, including G4S. This should be done at the earliest possible opportunity using internal channels.
- 1.3.2 Employees are assured that they can come forward on a confidential basis. Any criticism, harassment or victimisation of employees who raise concerns under this policy will not be tolerated and such behaviour will be dealt with through the disciplinary procedures of G4S Employment Support Services.
- 1.3.3 Appropriate confidentiality will be accorded, and protection given, to any employee who raises a genuine concern. All concerns raised will be properly considered and dealt with as appropriate. No employee will be punished for raising a genuinely-held concern.
- 1.3.4 The Whistleblowing Policy is not intended to cover such matters as would normally be undertaken through the Grievance Procedure. As an example issues around terms and conditions of employment, harassment and individual related matters would fall outside this policy.

PROCEDURE

- 1.4.1 Where employees see: (a) any form of theft; (b) behaviour, practices or systems that may be fraudulent or encourage fraudulent behaviour; or (c) any other malpractice; or (d) any form of discriminatory behaviour, words or practices; or (e) any other improper conduct; or (f) any other unethical behaviour; or (g) any attempt to conceal any of the above they are encouraged to raise this matter with their Line Manager as soon as possible. Employees should have reasonable grounds for having such concerns.
- 1.4.2 If, for whatever reason, the employee feels that it is not appropriate to raise this matter directly with a manager, there is the G4S 'Speak Out' service which allows employees the opportunity to report any concerns about serious wrongdoing, such as breaches of laws, regulations or company policy. This can be reported via www.g4s-speakout.com or telephone on 0808 234 8852. Employees can use the 'Speak Out' service in confidence and remain anonymous if they so wish.
- 1.4.3 Based on the information provided by the Whistleblower a report will be made to G4S's Head of Human Resources in confidence about the issue. The Human Resource Business Partner will nominate G4S Employment Support Services' Managing Director to investigate the concern(s) raised and will handle the investigation and the Head of HR will 'own' the investigation and its findings.
- 1.4.4 As the owner of the report, the line manager or Head of Human Resources will keep the employee informed about the investigation and will feedback the findings of their investigation to the Whistleblower within **15 working days** in an appropriate format. However, in certain cases, it will not be possible to feedback precise information because of the need to protect the confidentiality of other employees or if a name is not provided by the Whistleblower.
- 1.4.5 If the investigation takes longer than 15 working days to complete the Head of Human Resources will inform the Whistleblower of this at 15 working days and will then provide an **update every 10 working days** to the Whistleblower in an appropriate format.
- 1.4.6 DWP will be notified immediately of receipt of any instances of Whistleblowing. Once the investigation is complete, the findings will be relayed to the Department for Work and Pensions at the earliest opportunity. Any instances of fraud within the G4S Supply Chain will also be immediately relayed to the Department for Work and Pensions at the earliest opportunity.
- 1.4.7 If the employee who raised the concern is not satisfied with the outcome of the investigation they have a legal right to make disclosure to external bodies, as prescribed under the Public Interest Disclosure Act 1998.
- 1.4.8 Accusations of malpractice, which prove to be deliberately false or malicious may also be dealt with under the provisions of the G4S Employment Support Services disciplinary procedures
- 1.4.9 If the Whistleblower discloses that a criminal offence may (a) have been committed (b) is being committed, or (c) is about to be committed or (d) if suspicion exists that any of the above may apply then G4S will refer the matter to the Police and/or relevant law enforcement agencies.

POLICY

1.5 Employees of Sub-Contractors

- 1.5.1 G4S Employment Support Services subcontracts 100% of delivery to the very best private, voluntary and public sector delivery partners. G4S Employment Support Services welcome Employees of Sub-Contractors to raise concerns about malpractice, improper conduct and unethical behaviour of any sort, as well as any attempts to conceal such behaviour within provider organisations and the whole supply chain, including G4S. This should be done at the earliest possible opportunity using internal channels within the Sub-Contractor's organisation in the first instance.
- 1.5.2 Employees of Sub-Contractors are assured that they can come forward to G4S on a confidential basis through Expolink, an external, independent, specialist organisation.
- 1.5.3 Appropriate confidentiality will be accorded, and protection given, to any Sub-Contractor Employee who raises a genuine concern. All concerns raised will be properly considered and dealt with as appropriate.

PROCEDURE

- 1.6.1 Where Employees of Sub-Contractors see: (a) any form of theft; (b) behaviour, practices or systems that may be fraudulent or encourage fraudulent behaviour; or (c) any other malpractice; or (d) any form of discriminatory behaviour, words or practices; or (e) any other improper conduct; or (f) any other unethical behaviour; or (g) any attempt to conceal any of the above they are encouraged to raise this matter with their Line Manager within the Sub-Contractor as soon as possible. Sub-Contractor Employees should have reasonable grounds for having such concerns
- 1.6.2 If, for whatever reason, the Sub-Contractor Employee feels that it is not appropriate to raise this matter internally, a confidential telephone line run by Expolink, an external, independent, specialist organisation, can be used to report concerns on **0800 915 9087**. Employees of Sub-Contractors can use the whistleblowing telephone line in confidence and remain anonymous if they so wish.
- 1.6.3 Based on the information provided by the Whistleblower, a report will be made to the Audit and Compliance Manager and the Head of Finance. The Audit and Compliance Manager will oversee the investigation. The Audit and Compliance Manager will carry out the investigation and also own the investigation and findings.
- 1.6.4 The Audit and Compliance Manager will keep the Sub-Contractor Employee informed about the investigation and will feedback the findings of their investigation to the Whistleblower within **15 working days**. However, in certain cases, it will not be possible to feedback precise information because of the need to protect the confidentiality of other employees or if a name is not provided by the Whistleblower.
- 1.6.5 If the investigation takes longer than 15 working days to complete, the Audit and Compliance Manager will inform the Whistleblower of this at 15 working days and will then provide an **update every 10 working days** to the Whistleblower in an appropriate format.
- 1.6.6 DWP will be notified immediately of receipt of any instances of Whistleblowing. Once the investigation is complete, the findings will be relayed to the Department for Work and Pensions at the earliest opportunity. Any instances of fraud within the G4S Supply Chain will also be immediately relayed to the Department for Work and Pensions at the earliest opportunity.

- 1.6.7 Accusations of malpractice which prove to be deliberately false or malicious may result in the identity of the Whistleblower (if provided) to be divulged to the Sub-Contractor for appropriate internal disciplinary procedures.
- 1.6.8 If the Whistleblower discloses that a criminal offence may (a) have been committed (b) is being committed, or (c) is about to be committed or (d) if suspicion exists that any of the above may apply then G4S will refer the matter to the Police and/or relevant law enforcement agencies.

POLICY

1.7 G4S Customers

- 1.7.1 G4S Employment Support Services welcome G4S Customers to raise concerns about malpractice, improper conduct and unethical behaviour of any sort, as well as any attempts to conceal such behaviour within provider organisations and the whole supply chain, including G4S. This should be done at the earliest possible opportunity.
- 1.7.2 Appropriate confidentiality will be accorded, and protection given, to any G4S Customer who raises a genuinely held concern. All concerns raised will be properly considered and dealt with as appropriate. No G4S Customer will be punished for raising a genuinely-held concern and any disclosures will not affect your provision or service received whilst on any G4S Programme

PROCEDURE

- 1.8.1 Where G4S Customers see (a) any form of theft, (b) behaviour, practices or systems that may be fraudulent or encourage fraudulent behaviour or (c) any other malpractice or (d) any form of discriminatory behaviour, words or practices or (e) any attempt to conceal any of the above then G4S Customers should raise a concern as soon as practicable to their Provider. G4S Customers should have reasonable grounds for having such concerns.
- 1.8.2 If, for whatever reason, a G4S Customer feels that it is not appropriate to raise this matter directly with their provider, a confidential telephone line run by Expolink, an external, independent, specialist organisation can be used to report concerns on **0800 915 9087**. G4S Customers can use the whistleblowing telephone line in confidence and remain anonymous if they so wish.
- 1.8.3 Based on the information provided by the Whistleblower, a report will be made to the Audit and Compliance Manager. The Audit and Compliance Manager will carry out the investigation and own the investigation and findings.
- 1.8.4 The Audit and Compliance Manager will keep the Customer informed about the investigation and will feedback the findings of their investigation to the Whistleblower within **15 working days**. However, in certain cases, it will not be possible to feedback precise information because of the need to protect the confidentiality of the Customer or if a name is not provided by the Whistleblower.
- 1.8.5 If the investigation takes longer than 15 working days to complete, the Audit and Compliance Manager will inform the Whistleblower of this at 15 working days and will then provide an **update every 10 working days** to the Whistleblower in an appropriate format.
- 1.8.6 DWP will be notified immediately of receipt of any instances of Whistleblowing. Once the investigation is complete, the findings will be relayed to the Department for Work and Pensions

at the earliest opportunity. Any instances of fraud within the G4S Supply Chain will also be immediately relayed to the Department for Work and Pensions at the earliest opportunity.

- 1.8.7 If the Whistleblower discloses that a criminal offence may a) have been committed b) is being committed, or c) is about to be committed or if suspicion exists that any of the above may apply then G4S will always refer the matter to the Police and/or relevant law enforcement agencies.

Please also refer to the G4S Care and Justice Services (UK) Limited Grievance Policy and Procedures.

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