



Whistleblowing Policy

Purpose

The Parliamentary Works Sponsor Body ("Sponsor Body") promotes the principles of equality, diversity and inclusion, and trusts its employees, agency/interim workers and contractors to carry out their work with integrity. We appreciate there may be instances when things will go wrong and want to encourage everyone to speak up about any concerns they may have.

We are committed to maintaining a culture of openness, transparency and a safe working environment, and will look into any concerns, providing support to those who raise them. Anyone who raises a genuine concern under this policy will not be at risk of losing their job or suffer any form of reprisal as a result.

Scope

Whistleblowing, or a disclosure, will happen when information concerning a wrongdoing within the Sponsor Body is revealed. The Public Interest Disclosure Act 2018 and the Employment Rights Act 1996 provide protection for whistleblowers so they do not suffer any detrimental treatment or victimisation as a result of making a 'protected disclosure'.

Personal grievances and complaints are not usually covered by the whistleblowing law, and matters relating to bullying and harassment are managed under the Grievance Policy or the Parliamentary Independent Complaints and Grievance Scheme.

Principles

- Everyone working within the Sponsor Body should be aware of the importance of preventing and helping to eliminate wrongdoing within the Sponsor Body, and the wider Restoration and Renewal Programme, including any illegal or unethical conduct.
- A wrongdoing can fall into one or more of the following categories: -
 - criminal offences (e.g. financial impropriety such as fraud, bribery, theft)
 - failure to comply with an obligation set out in law
 - miscarriages of justice
 - endangering someone's health and safety
 - damage to the environment
 - someone covering up wrongdoing
- All Sponsor Body employees, interim/agency workers and contractors can raise concerns or disclosures from the day they start work with the Sponsor Body.
- Any concerns raised under this policy will be investigated promptly and confidentially.
- The Sponsor Body will not tolerate the harassment or victimisation of anyone who raises a concern or makes a disclosure as a whistleblower, as required by law. Disciplinary action will be taken against any Sponsor Body employee, agency/interim worker or contractor who victimises anyone who has raised a concern under this policy.



- If you have raised a legitimate concern, as a Sponsor Body employee, agency/worker, or contactor you will continue working for the Sponsor Body in line with the agreed contractual arrangements. Sponsor Body employees will continue to have opportunities for future promotion or training.
- Employees and agency/interim workers will be protected by the whistleblowing law if they reasonably believe they are acting in the public interest and they believe that the disclosure has happened, is happening or is likely to happen in the future. Sponsor Body employees, agency/interim workers or contractors who make malicious and false allegations will be disciplined under the Disciplinary Policy.
- No one should feel intimidated and, as a result, cover up any wrongdoing. Disciplinary action could be taken against any Sponsor Body employee, interim/agency worker or contractor who tries to coerce another into not reporting a concern. Any such situations should be raised with a Director or the Chief Executive Officer or the Chair of the Sponsor Board, as appropriate.

Implementation

Sponsor Body employees, agency/interim workers or contractors may raise concerns or disclosures **verbally or in writing**. Any concerns or disclosures can be raised in the first instance with the Finance and Corporate Services Director or the Chief Executive Officer or the Chair of the Sponsor Board, as appropriate.

If the person raising the concern or disclosure wishes to make a written statement, they should set out the matter providing the background and details including relevant dates and specific reasons why they believe the concern or disclosure is of public interest. Any concerns or disclosures of wrongdoing will be treated with utmost sensitivity.

A request for **confidentiality** by the person raising the concern or disclosure will be treated with respect. However, it may be necessary to reveal the identity of the person raising the concern or making the disclosure, if required by law, in order to resolve the matter.

Where the concern or disclosure is raised in **anonymity** (the person does not give their name) the investigation may reveal the source of information and the whistleblower's identity. Anyone raising a concern or making a disclosure is encouraged to put their name to the concern or disclosure, in the strictest confidence. However, raising a concern anonymously is encouraged instead of staying silent about potential wrongdoing.

The person who receives the information on the concern or disclosure will either conduct, or arrange for, an **investigation** within 7 working days of it being brought to their attention, and it may involve getting a written statement from the person who has raised the concern or made the disclosure and any other identified individuals. The investigation should be **concluded within 30 working days** from when the concern or disclosure is raised.

- The investigator will prepare a report on their findings for consideration by the Chief Executive Officer or the Chair of the Sponsor Board, as appropriate.
- The outcome of the investigation may be:
 - no formal action and/or a recommendation to attend relevant training;



- a recommendation for disciplinary action which will be managed under the Disciplinary Policy with the support of a member of the HR team;
 - a report to the relevant regulatory body;
 - a review of the relevant internal processes and policies.
- Feedback, as appropriate and in strict confidence, will be provided to the whistleblower within 14 days of them raising the concern or making the disclosure, if they have given their name.
- If the whistleblower reasonably believes that the appropriate action has not been taken, they can raise their concern or disclosure with the relevant regulatory body. However, it is important that concerns are initially raised within the Sponsor Body at the earliest possible time, to allow for the opportunity to address and resolve any concerns quickly and by the most appropriate means.
- Support and guidance are available from the Sponsor Body HR team and Senior Leadership team, or the Parliamentary Independent Grievance and Complaints Scheme, or through the Employee Assistance Programme.

Training

Sponsor Body employees, agency/interim workers and contractors are required to complete training, and as part of the induction, to confirm their awareness of the Sponsor Body codes, policies, procedures and processes particularly Anti-Bullying and Harassment, Code of Conduct and Behaviour Code, Equality, Diversity and Inclusion, Fraud and Bribery, Staff Expenses, Gifts and Hospitality and Register of Interests, Acceptable Use of Digital Services, and Whistleblowing.

Review

This policy will be reviewed annually, over the life of the Restoration and Renewal Programme, or sooner if there is a specific legislative, regulatory or service requirement or a change in practice to support the improvement of this policy.

Sarah Johnson
On behalf of the Sponsor Body
July 2020