

Whistleblowing Policy

Document Control and Revision History:
Review annually with approval via Senior Executive Team

Author	Summary of changes	Version	Authorised & Date
<i>Group Head of People and Culture and Group Governance and Risk Manager Director P&C</i>	<i>Review of March 2025 policy draft</i>	1, January 2025	June 2025
		2, June 2025	
	<i>Review by SET</i>	v.3	14 07 2026

1. Purpose

LHC Procurement Group (LHCPG) encourages all individuals to raise any concerns they may have about the conduct of others or the way the company is run.

LHCPG is committed to the principles of honesty and integrity and a culture of openness and accountability is critical to ensuring that these values are authentically demonstrated and, aligned to this, it is important that any fraud, misconduct or wrongdoing is reported to enable it to be properly dealt with.

The aim of the policy is to enable those who become aware of wrongdoing within LHCPG which affects some other person or service, to report their concerns at the earliest opportunity so that they can be properly investigated.

This policy applies to all employees, workers, agency staff, contractors, board members and employees of service providers or suppliers.

The policy does not form part of any employee's contract of employment and it may be amended at any time.

2. Definitions

Whistleblowing means the reporting of information which relates to actual or suspected wrongdoing related to a 'qualifying disclosure', which is one made in the public interest by an employee who has a reasonable belief that, any of the following, for example, has been or is likely to be committed:

- a criminal offence or a breach of any legal obligation
- a miscarriage of justice
- an act creating a risk to health and safety of the public and/or other employees
- an act causing damage to the environment
- unauthorised use of public funds or other assets
- possible fraud and corruption
- neglect or abuse of clients
- other unethical conduct
- sexual harassment (from 6 April 2026) even if the incident occurred prior
- concealment of any of the above

This list is not exhaustive.

Where a disclosure fails to show that wrongdoing has been or is likely to occur, it cannot amount to a qualifying disclosure for the purposes of the whistleblowing legislation.

Those who are considering making a disclosure are encouraged to seek support from a member of the Senior Management Team (SET) or the Senior Leadership Team (SLT) if they are unsure whether to make a disclosure or to access support in making a disclosure, regardless of whether it is qualifying or not.

3. Scope

i) Employees

This policy is not intended to replace existing procedures. If an employee's concern relates to how they have been treated this should be raised under LHCPG's Grievance Policy or the Bullying and Harassment Policy and these apply only to company employees.

LHCPG encourages the disclosure of concerns regardless of whether they are covered by this or another policy. If misconduct is discovered as a result of any investigation under this policy that will be dealt with under the LHCPG Disciplinary Policy.

Where any concern about an issue which is believed to evidence conduct which is dangerous, against the law, or that breaches ethical or professional codes, is raised, LHCPG employees are encouraged to report this so steps can be taken to ensure that this is properly addressed.

Whistleblowing is not considered to include:

- An immediate threat to life or property: If emergency assistance is required please contact the appropriate emergency services.
- Personal or legal disputes.
- Accusations which you know are false. Doing so may lead to disciplinary measures for LHCPG colleagues.
- Specific health and safety incidents which you may report by informing your line manager.

ii) External stakeholders

This policy includes arrangements for whistleblowing from external stakeholders which include client partner organisations, appointed companies, non-governmental organizations, and/or members of the communities in which LHCPG operates.

As a Procurement Framework Provider there may be a heightened risk of Fraud, Anti Money Laundering, Corruption and Bribery and these are recognised within LHCPG's risk management arrangements (which has a corresponding policy). Risk and bribery may be perceived or actual where partnership between customers leads to collusion in

respect of framework participation and/or contracts awarded for works, goods and services.

4. General Principles

i) Obligations of the Whistleblower

- a) Whistleblowing without using the procedure set out may be considered a breach of this policy. It is not appropriate to whistle blow to the media in any circumstances, especially in advance of formal investigation, and may be considered gross misconduct. Although most concerns are raised with good intentions, maliciously making a false allegation is a disciplinary offence under the company disciplinary policy.
- b) Potential whistleblowers should have reasonable grounds for believing the information they are disclosing is accurate. It is not necessary for an employee to have proof of such an act for the protections of this policy to apply; they must only have reasonable belief.

ii) LHCPG's commitment

Any matter raised under this policy will be investigated thoroughly, promptly and confidentially.

Whilst it will be the aim to keep the whistleblower informed of the progress of the investigation and likely timescales, sometimes requirements of confidentiality will prevent full information about the investigation and any consequential disciplinary action from being disclosed.

iii) Protection for whistleblowers

This policy takes account of Part IVA of the Employment Rights Act 1996 which protects workers making protected disclosures.

A whistleblower who makes a qualifying disclosure has the right not to be dismissed, subjected to any detriment or victimised, because they have made a disclosure.

Victimisation of a whistleblower for raising a qualifying disclosure will be a disciplinary offence.

LHCPG will not dismiss anyone on the basis that they have made an appropriate lawful disclosure in accordance with the law and this policy.

Whistleblowers may seek support and advice from organisations such as the whistleblowing charity Protect (www.protect-advice.org.uk) or ACAS (www.acas.org.uk)

Where a genuine concern is raised under this policy, LHCPG will support the whistleblower fully even if it is identified through investigation that a mistake was made by whistleblowing or that there has been no breach of policy, legal obligation or other activity set out above.

All whistleblowers are given the same protection. It is prohibited to threaten or otherwise badly treat others who have raised concerns under this policy and doing so may result in disciplinary action which could include dismissal for gross misconduct. The whistleblower may also be able to raise a legal action.

If an employee becomes concerned about their position after having made a disclosure under this policy they should contact the People and Culture team for advice. Support is also available through the Employee Assistance Programme (see Contacts section below)

iv) Confidentiality, anonymity and protection

This policy and related procedure respects the principles of privacy and security to facilitate trust and ensure confidentiality. LHCPG encourages individuals to voice their concerns openly. Anonymous concerns will be taken seriously and investigated as far as is possible under this policy.

LHCPG does not encourage anonymous disclosure as this may make it harder to establish the credibility of an allegation and may make investigation difficult or impossible.

In cases where concerns are raised confidentially, every effort will be made to keep identities secret and the whistleblower will be consulted before divulging their identity to any party, including an investigator.

When an individual makes a disclosure LHCPG will process any personal data which is collected in accordance with its data protection policy. Data collected from the point at which the individual makes the report will be held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

Both employees and external whistleblowers can expect to be fully supported in raising concerns under this policy, even if it is found through investigation that they are mistaken or that there is no breach of policy or legal obligation.

The procedure within this policy describes how employees and external stakeholders can take further steps if they feel they have been badly treated.

All whistleblowers are accorded the same level of protection and no employee should threaten or otherwise badly treat others who have raised concerns under this policy.

Should such circumstances arise then the employee could face disciplinary action through the company and/or legal action by the whistleblower.

The use of encryption technology, granular permission management and measures to assure a reporter's anonymity are integral requirements of a whistleblowing system which is compliant with GDPR.

Data Protection arrangements are also allowed for in the company specification for sub-contract to a third party / external service (in all or in part) to maintain objectivity, independence, confidentiality and anonymity of the procedure within this policy in compliance with legislation and regulation.

v) Contacts

LHCPG uses the services of a third party provider, [Safecall](#), for the purposes of facilitating disclosures under this policy.

The Safecall telephone number is 0800 915 1571. Safecall's phone lines are available 24 hours a day, 7 days a week.

Safecall provides anonymous whistleblowing hotlines which are supported by experienced former UK police officer call handlers who are available 24/7, 365 days a year.

Calls are taken by a Safecall call handler. If English is not your first language the services of an interpreter can be requested.

Contact details for the independent whistleblowing charity [Protect](#) 'Protect' are

- Helpline 0203 117 2520
- Email whistle@protect-advice.org.uk

This website provides useful resources to aid company employees and external stakeholders to make a disclosure. The charity also provides a support and advice service.

Employees can access the company **Employee Assistance Programme** should they wish.

<https://wisdom.healthassured.org/login>

[Wisdom: Mental Health Support](#) app is available in the Appstore.

Organisation code - MHA255653

Landlines are open 24/7, 365 - 0800 028 0199

vi) Communicating the Policy

LHC PG will promote this Policy, and the process for making disclosures via Safecall, to staff via:

- Inclusion of the Policy on the Group Website.
- Printed signage in every office within the Group.
- Coverage of the Policy in colleague onboarding and induction.
- The Board Level Employee Representative.
- vii) Coverage at a Townhall or the Core Brief following the annual review of the Policy.

Procedure for making a disclosure

The process for making a disclosure is set out in the Appendix.

Monitoring and Review

The effectiveness of this policy will be monitored by the Director of People and Culture and it will be reviewed annually in conjunction with the Senior Executive Team (SET) and ratified by the LHCPG Board.

Revision history

O365 Version	Date of Change	Details of Change	Changed by	Approved by
	June 2025	First issue	Draft created jointly by Governance Manager, Group Head of P+C and CFO	SET
	June 2026	Annual review. Check that links in document remain current. Addition to list of definitions following sexual harassment becoming a qualifying disclosure as from 1.4.26 under the Employment Rights Act 2025	P+C	

APPENDIX

PROCEDURE FOR MAKING A DISCLOSURE

Stage 1 – Disclosure via [LHC Safecall](#)

Personal or legal disputes should not be reported through Safecall.

Disclosures may be made by:

- an LHCPG employee
- an employee of a client partner organisation or appointed company, or any other external stakeholder, in relation to the perceived or actual behaviour of an LHCPG employee and/or customer employee

All whistleblowing disclosures should be made via the Safecall service either:

- online via [LHC Safecall](#)
 - by telephone 0800 915 1571
- If English is not your first language an interpreter can be requested.

Whistleblowing disclosures should clearly set out the concerns being raised including all key facts, dates, and the names of those involved.

An external whistleblower may be a representative of a client partner organisation and/or appointed company where a disclosure arises through an external organisation's own equivalent whistleblowing policy. This may not therefore be the individual source whistle blower. Where this applies LHCPG shall consider in good faith and in collaboration with its customer which policy and related instructions are to be used to effect investigation as set out in this policy. The overarching principles are deemed to remain the same whatever policy is followed.

The independent charity Protect has resources to aid the whistleblowing procedure and these can be accessed here:

- <https://protect-advice.org.uk/checklist-for-whistleblowers/>
- <https://protect-advice.org.uk/raising-a-concern/>
- <https://protect-advice.org.uk/contact-protect-advice-line/>

Stage 2 – Investigation

An investigation into the concerns raised will take place as soon as reasonably practicable. The investigation may involve the whistleblower and other individuals involved meeting with the Investigator and giving a written statement.

At any investigatory meetings the whistleblower is entitled to be accompanied by a companion such as a work colleague or trade union representative if wished. LHCPG reserves the right to involve specialists with particular knowledge or experience of the issues as have been raised dependent on their scope and nature.

Where individual needs arise in relation to accessibility and equality, such measures as virtual meetings, interpretation and companions speaking on behalf of whistleblowers may be used as deemed appropriate.

Stage 3 – Reporting

The Investigator will provide a report to Vice Chair of the LHCPG Board (Chair if the investigation relates to the Group CEO, or nominated independent Board Director in the absence of a Vice Chair) before any further action is taken.

The Vice Chair (or nominated independent Board Director) will decide on potential outcomes including, but not limited to:

- invoking LHCPG's disciplinary process, or other relevant policy
- referral to the police, government department or regulatory agency
- no further action

Stage 4 – External Escalation

If on conclusion of stages 1,2 and 3 the whistleblower reasonably believes that the appropriate action has not been taken, they should report the matter to the appropriate authority.

The legislation sets out a number of bodies to which qualifying disclosures may be made, including the Financial Conduct Authority, the Health and Safety Executive and the Environment Agency. A full list can be obtained from the BEIS (Department for Business, Energy and Industrial Strategy) website.

Stage 5 – Final outcome

Following the final outcome, the wider Board of Directors shall be informed for completeness that a whistleblowing concern had been raised and investigated. Recommendations and learning actions may be disclosed, however details of the substantive investigation and individuals involved shall remain private so as to protect individual confidentiality.