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Please refer to the company's Whistleblowing Policy for further information. The Whistleblowing Policy details the protections afforded to Co-Members when making protected disclosures which in some cases may apply to the reporting of unacceptable practices.

#### **4.11 Consequences of Unethical Business Practice**

If concerns about a Co-Member's files, actions, inactions or business practices lead the company to suspect unethical or fraudulent practice, a thorough investigation of the matters arousing suspicion will be launched by the Company.

If we believe that there is strong evidence to support allegations of unethical or fraudulent practice the Co-Member and their team may be suspended from work pending the outcome of the investigation. Once the investigation is complete the Co-Member will be informed either:

- that insufficient evidence has been found and where appropriate will be briefed in conjunction with their line manager on the nature of the information that came to our attention.
- that the investigation has produced prima facie evidence to support an allegation of misconduct or gross misconduct and an invitation to attend a disciplinary interview will follow.

If the allegations of unethical or fraudulent practice made at the disciplinary interview are proven, the Co-Member may be summarily dismissed without pay or notice. The company may also be obliged to reveal the reason for the Co-Member's dismissal in references and to funders' investigatory bodies.

The company may seek to recover any financial loss as a result of the Co-Member's Actions from the Co-Member through the courts.

Breach of any processes and procedures that result or could have resulted in financial loss constitutes theft and a report will be made to the Police in the event of allegations being proven at a disciplinary interview. A conviction of theft may lead to a custodial sentence.

#### **4.12 Whistleblowing Policy**

In line with our core values (see section 2 above), Reed supports and encourages a culture of the highest standards of honesty and accountability, whereby Co-Members feel able to express their concerns without being victimised or penalised in any way. The Public Interest Disclosure Act 1998 offers protection against victimisation or dismissal for workers who "blow the whistle".

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**Situations covered by this policy**

This policy has been designed to cover situations where Co-Members have a genuine concern that one of the following has taken place, or is likely to be taking place:

- A criminal offence and/or dishonesty, for example: theft of Company property, theft or fraudulent claiming of public money, falsification of expense or bonus claims, bribery etc.
- Abuse of a position of trust by a Co-Member (this includes but is not limited to Co-Member conduct with programme participants that is believed to be in breach of our Children & Young Persons Safeguarding and/or Adults at Risk Safeguarding policy)
- A failure to comply with a legal obligation (this includes both statutory obligations and acts which are deliberately in breach of contractual obligations)
- Commercial concerns - relating to business methods, controls, management style and processes, and any other area of concern for existing or developing businesses
- Endangering an individual's health or safety
- A miscarriage of justice
- Material breach of procedures
- Conduct likely to damage Reed's reputation
- Improper conduct, or attempts to conceal any of the above.

This list is intended as a guide and is not exhaustive.

**What should you do if you come across this kind of situation?**

If you become aware of any such act you should immediately notify as detailed below:

- should you become aware of, or suspect, any unacceptable practices in your team then you must escalate it to your manager who will be obliged to report the issue to the Head of Risk Management, or the Managing Director, or the Chairman.
- If you suspect your manager to be involved in the unacceptable practice then you should instead report the issue as you see it directly to the Head of Risk Management or the Managing Director or the Chairman by sending an email to [james.reed@reedglobal.com](mailto:james.reed@reedglobal.com).
- If you are unsure whether or not the act you are aware of should be reported in line with this procedure, or the Reporting Unethical Business Practice section of the Co-Member Handbook, you should contact your HR team who will be able to advise accordingly.

We hope that Co-Members will feel able to voice their concerns openly under this Policy. However, you may wish to raise your concern or allegation anonymously. In doing so, you need to be aware that the validity of your concerns may be more difficult to establish and the ability of Reed in Partnership to investigate the issues raised may be impeded. No feedback about the progress or outcome of the investigation will be possible if the concerns have been raised anonymously.

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If you have any concerns, you can seek advice from Public Concern at Work, the independent whistleblowing charity. Details of the services they offer are available their website at [www.pcaw.org.uk](http://www.pcaw.org.uk).

This Policy should not be used for complaints relating to your own personal circumstances such as the way you have been treated at work. In those cases you should use the Grievance Policy and Procedure or the Bullying, Harassment and Sexual Harassment Policy as appropriate. If you are uncertain whether your concern is within the scope of this Policy, you should seek advice from your manager, Director or HR Team.

Reed recognises that the decision to report a concern can be a difficult one to make. If what you are saying is true, you should have nothing to fear because you will be doing your duty to the organisation and those for whom you provide a service. If concerns are raised in the reasonable belief that it is in the public interest but not proven, no action will be taken against you. Concerns should not be raised nor allegations made frivolously, maliciously or for personal gain.

Reed will not tolerate any victimisation or detrimental treatment on the basis of raising concerns or allegations under this policy in the reasonable belief that it is in the public interest and should you have any concerns in this regard please do not hesitate to contact the HR team.

## **Confidentiality**

Your identity will be protected wherever possible. Reed will take responsibility for taking action forward, and will keep you informed, where appropriate.

## **What will happen as a result?**

Once you have brought your concern or allegation to the attention of the appropriate Director, manager or the Internal Audit Team, they may seek to interview you privately, taking details and all relevant information. You may bring a colleague or union representative to any meetings arranged in relation to this Policy. You should expect this to happen within ten working days. During this interview, a written summary of your concern will be agreed and you will provided with a copy after the meeting. We will then discuss with you what the appropriate course of action is.

We will aim to keep you informed of the progress of the investigation and its likely timescale, although sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any resulting disciplinary action. You should treat any information about the investigation as confidential.

## **Contact with the Police**

While we are keen to assist the Police with any enquiries they may have and to contact them in the event of any suspected wrong doing, no Co-Member may make contact with or disclose information to the Police on the Company's behalf without first having the approval of a Board Director.

**Document Control**

<b>Version</b>	<b>Changes</b>	<b>Date live</b>	<b>Document Owner</b>
1	New Co-Member handbook introduced	1 <sup>st</sup> October 2010	Lawrence Carter, Director of HR, L&D
2	Updated to reflect introduction of Modern Slavery legislation	1 <sup>st</sup> December 2016	Richard Stacey, Head of HR
3	Reviewed as part of Co-Member Handbook review	1 <sup>st</sup> December 2018	Richard Stacey, Head of HR