



Whistleblowing Policy

EY Foundation

October 2021

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1. Introduction

The EY Foundation (“EYF”) is committed to acting fairly and lawfully in all the work we do, in the public interest. We welcome feedback where we have not met the high standards that we set ourselves. This feedback will enable us to improve what we do in the future and to prevent any instances of wrongdoing.

2. Whistleblowing Policy

2.1 Who this policy applies to

This policy applies to everyone who works for the EYF in some way, whether paid or unpaid, including employees, contractors, secondees, volunteers, and young people whilst employed on EYF programmes.

Corporate partners and young people who are not currently employed by EYF (including, but not exclusive to, young people alumni and youth advisory board members) should refer to the separate Complaints Policy.

2.2 Aims and Purpose of this policy

The aim of this policy is to provide a clear and transparent way for anyone who works for the EY Foundation in some capacity to raise genuine concerns about acts of wrongdoing or malpractice in the workplace. It also aims to ensure that any concerns are dealt with effectively and in a timely fashion.

The EY Foundation has a professional duty to have appropriate procedures for investigating whistleblowing reports. All those who work for EYF should be aware of their right to voice a concern in complete confidentiality and without fear of retaliation.

During the course of business, you may become aware of conduct by EYF persons or EYF suppliers (or other associated external parties, including but not exclusive to corporate partners and youth service providers), which you either know or suspect is unlawful or otherwise unacceptable. You may have noticed the conduct yourself or you may have been contacted by someone else.

This policy sets out the processes in place to ensure that all persons who work for EYF, as defined above, are not penalised for raising genuine concerns, even if those concerns prove to be unfounded. It also provides the means for taking disciplinary action against anyone who is found to have raised false concerns with malicious intent.

This policy runs alongside all existing EY Foundation policies including the Volunteering Policy, specifically for volunteers, Complaints Policy, specifically for external complaints, and the EY Foundation Child and Vulnerable Adult Protection Policy and Procedures, for anyone working closely with our young people.

This policy will be reviewed every three years, most recently in 2021.

2.3 What is whistleblowing?

Whistleblowing occurs where a concern is raised not as a complaint or feedback to the person(s) directly concerned with the subject matter, but as a confidential report.

It is not possible to provide an exhaustive list of the circumstances that may give rise to a whistleblowing report, and no statutory or regulatory definition exists. However, some examples of the type of conduct (either by EYF, its staff or third parties) about which a whistleblowing report might be raised could include the following:

- conduct which is an offence or breach of the law;
- breaches of health and safety or environmental requirements;
- the unauthorised use of charitable funds;
- possible fraud and corruption;
- actions that negatively affect the welfare of children or vulnerable adults (safeguarding);
- sexual, physical or verbal abuse, or bullying or intimidation of employees, customers or service users;
- abuse of authority;
- other unethical conduct.

In respect of the conduct of EYF persons (be that employees, contractors, secondees, volunteers, and the young people employed on EYF programmes), a whistleblowing report could include any concern in respect of the Foundation's commitment to quality work, professional judgment and values.

2.4 Confidentiality

All reports received will be dealt with confidentially and, if you provide personal details, in accordance with the requirements of the Data Protection Act 2018.

2.5 Prescribed Persons

Whistle-blowers may wish to make a report to a Prescribed Person if they do not wish to report a concern directly to the employer. Please find some independent external parties listed under Section 4 that can act as a Prescribed Person or give further guidance.

3. Whistleblowing Procedure

3.1 What to do if you wish to raise a concern about malpractice

If you wish to raise a concern specifically about a young person or vulnerable adult, consult the EY Foundation Child and Vulnerable Adult Protection Policy and Procedures for more guidance.

If you wish to raise a concern about any other form of malpractice, you can do so by contacting one or more of our designated responsible whistleblowing individuals/parties (full contact details provided at the end of this document) by email or telephone.

3.2 What information to include in your report

We ask that you provide us with as much information as possible, including:

- (i) the reason for your concern
- (ii) where and when the cause for concern arose
- (iii) names of those involved (if known)
- (iv) what outcome you are hoping for
- (v) your contact details

Please note if you submit a claim anonymously, i.e. do not disclose your identity and/or the identity of the person(s) you have concerns about, we will be unable to take the claim further as we will not have sufficient information to proceed.

3.3 Who to send your concern to

Please address your concern in the first instance to the designated responsible whistleblowing individuals/parties listed below. Training for these contacts will have been provided where necessary.

1. EY Foundation Acting Chief Executive (Lynne Peabody)
lpeabody@eyfoundation.ey.com
+44 20 7951 5803 or +44 7468 740282
2. EY Foundation Joint CFO (Nil Neale)
nneale@eyfoundation.ey.com
+44 20 795 15721
3. EY Foundation Joint CFO (Mark Smith)
Mark.Smith1@eyfoundation.ey.com
+44 (0)207 980 9117
4. EYF Trustee and Chair of Audit & Risk Committee (Sara Fowler)
Sfowler@saftconsulting.com
+44 (0) 7887 633092

5. Independent external party (Charity Commission or Protect)

3.4 What to do if someone raises a concern with you about malpractice

If someone informs you that they are concerned about the actions of another EYF person(s), EYF supplier(s) or other associated external party (parties), you should reply to them as soon as possible.

If you are not a designated responsible whistleblowing individual/party, you should establish why he/she has chosen to discuss the concern with you.

You must then inform the person that either you, or they, are obliged to contact one of the designated responsible whistleblowing individuals/parties as soon as possible to make them aware, but you should not refuse to hear what the person has to say. You should make notes of your discussions with the individual and check the accuracy of your notes with him/her.

After discussion, you, or they, must contact one of the designated responsible whistleblowing individuals/parties as soon as possible, following steps 1 - 3 above. You should not take any further action unless otherwise advised by a designated responsible whistleblowing individual(s)/independent external party(parties).

3.5 How your concern will be handled

If your claim is not anonymous, the designated responsible whistleblowing individual(s)/party(parties) who you choose to contact from the list above will reply to you within 5 working days (either in writing, by telephone, or in person) to discuss your concern. Should this discussion be held in person, it can take place away from the workplace if necessary.

After discussion, you will be informed as soon as possible of the action that will be taken to address your concern. It may not be possible to disclose the full details of the outcome as it could concern confidential third party information, however we will share as much information as we are able to with you. If no action is to be taken in relation to your concern you will also be informed of this outcome and provided with the reasons why.

If you do not want the person(s) you have concerns about to know your identity, please make this clear to the designated responsible person(s) with whom you make contact. Every effort will be made to respect your wishes, but it cannot be guaranteed that your identity will not be disclosed. If this is the case, you will be informed beforehand and any issues you may have about this will be discussed with you.

If you need support in raising or communicating your concern, you may bring a work colleague with you to any meetings with the designated responsible whistleblowing individuals/independent external parties.

3.6 Conducting a formal investigation

Unless the matter is relatively minor and can be dealt with informally, one of the following designated responsible whistleblowing individual(s)/party(parties) should arrange for an investigation to be completed as swiftly as possible:

In order of priority

1. Joint EYF CFO's (Nil Neale and Mark Smith)
2. EYF Acting CEO (Lynne Peabody)
3. EYF Trustee/member of the Audit & Risk Committee (Sara Fowler)
4. Independent external party (Charity Commission or Public Concern at Work)

The investigation will be carried out by an impartial 'Investigating Manager' who will ensure that it is demonstrably thorough and impartial.

The scope of the investigation will be determined by the nature of the concern. Witnesses may need to be interviewed and records may need to be scrutinised. It is also possible that advice may be needed from someone with specialist knowledge in Human Resources.

3.7 Outcome of the formal investigation

Once the investigation is complete, a report will be produced summarising the nature of the concern, the investigation process and the outcome, including specific recommendations. Measures will be taken to preserve the anonymity of the person who raised the concern if this has been his/her wish.

If the concern raised is not upheld, this should be made clear.

If the concern is upheld and the person(s) who the claim was raised about is found to have been culpable or remiss in some way, the report's recommendations should be carried out using a clear plan of action. The plan may include the use of disciplinary action, training, coaching, counselling or the implementation of new policies or procedures for the whole workforce.

If it becomes apparent during the course of the investigation that a criminal offence may have been committed, the police will be informed. The EYF investigation may have to be suspended on police advice, if they decide that they need to become involved.

The person who raised the concern will be informed of the outcome but not the details of any disciplinary action. They may also be offered support if appropriate.

If the concern is unfounded and the person who raised it is found, through the process of investigation, to have acted maliciously or out of a desire for personal gain, disciplinary action may be considered against him/her.

4. Monitoring

The EY Foundation will maintain a Register of allegations raised and the processes adopted for their investigation and resolution.

The CFO will report quarterly to the Audit and Risk Sub-committee on the whistleblowing allegations made during the period.

The statutory period for retaining whistleblowing documentation is 6 months following the outcome or investigation. If the report is unsubstantiated then any personal information will be deleted immediately.

5. Further information, advice, and contact details

EY Foundation Contact Details:

The EY Foundation
1 More London Place
London
SE1 2AF
United Kingdom

Telephone: +44 (0)207 951 3133

Email: concerns@eyfoundation.ey.com

Designated responsible whistleblowing individuals/parties, in order of priority:

individuals/parties listed below. Training for these contacts will have been provided where necessary.

1. EY Foundation Acting Chief Executive (Lynne Peabody)
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+44 (0)207 980 9117
4. EYF Trustee and Chair of Audit & Risk Committee (Sara Fowler)
Sfowler@saftconsulting.com
+44 (0) 7887 633092
5. Independent external parties

- a. Charity Commission: <https://www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer>
 - i. Whistleblowing email: whistleblowing@charitycommission.gov.uk

- b. Protect (Whistleblowing charity): <https://protect-advice.org.uk/>
 - i. Confidential Advice Line: 020 3117 2520

 - ii. Whistleblowing contact form: <https://protect-advice.org.uk/contact-protect-advice-line/>

Resources for EY Foundation staff only:

Further advice for direct EYF employees can be obtained from EY HR ext. 65555 Option 2

EYF employees can also find out further information on the EthicsPoint website:

<https://secure.ethicspoint.com/domain/media/en/gui/6483/index.html>