Whistleblowing
Policy & Procedure

the calico group

Introduction

At Calico, our values and the behaviours we demonstrate in living these values are important to us and we believe they are central in allowing us to create a culture in which the business and individuals can flourish. We consider our values and behaviours in all of our decision making and in all of our internal literature to ensure that they remain at the forefront of everything that we do. Our expectation is that all of our employees respect our values and emanate our behaviours so that together we can fulfil our purpose of making a real difference to people's lives.

Calico Places great importance on "doing the right thing" to create a culture that is committed to fair, ethical and safe workplace practices. It is the company aim to provide high quality services to its customers and expect all employees to meet quality standards in their work.

The company believes that good working relationships, created through a culture of openness and transparency, should allow day to day problems with working practices to be resolved quickly and sensibly. Employees are encouraged to talk issues through and solve problems by working together.

It is the responsibility of all employees to address issues of poor practice directly with any persons employing poor practice. If this informal approach results in practices improving to the standards expected, it may be that no further action is necessary. However, there may be occasions when more serious issues are identified which cannot be addressed informally. In such situations, employees are encouraged and supported to report these matters formally.

The Whistleblowing procedure encourages and enables Board members and employees to raise serious concerns promptly and to the relevant persons so that issues can be resolved appropriately, minimising the impact to individuals and/or the company. The procedure respects confidentiality and supports employees to raise concerns without fear of reprisal.

Scope

This procedure applies to all Board Members, employees, agency workers, volunteers and contractors operating within the Calico Group. This procedure does not apply to customers. Customer concerns should be raised via the customer complaints process

There are existing procedures in place to enable employees to lodge a grievance relating to their own employment. The Whistleblowing Procedure is intended to cover major concerns that fall outside the scope of other procedures.

1. What is Whistleblowing?

Whistleblowing is 'making a disclosure in the public interest' and occurs when serious concerns are raised and/or certain types of information are provided about the working practices of either the organisation or an individual. Board members/workers are often the first to realise that there may be something seriously wrong within the Company.

The concerns are usually to the employer or a regulator and may be to report illegal, unsafe or unethical practices. This can include any kind of improper practice or conduct which falls short of what is reasonably expected whether it relates to a positive act or omission and also includes any form of harassment.

This may be about something that:

- Makes them feel uncomfortable in terms of known standards, Company values & behaviours
- Amounts to improper conduct
- Conduct which is a criminal offence or a breach of legislation
- Is against the Company's Standing Orders & Financial Regulations or other Company policies
- Health and safety risks, including risks to the public/other employees
- Damage to the environment
- Possible fraud and/or corruption
- Sexual physical or psychological abuse of clients
- Other unethical conduct

A concern or complaint about sexual harassment may, depending on the circumstances, also qualify as a protected disclosure (whistleblowing) under the Employment Rights Act 2025, where the usual legal tests are met (including reasonable belief and public interest). Sexual harassment complaints may also be addressed under other relevant procedures (for example, grievance and anti-bullying and harassment).

2. How to Raise a Concern

Where serious poor practice is identified, concerns should be raised to Line Managers or Supervisors. This depends, however, on the seriousness and sensitivity of the issue and who is thought to be involved. For example, if it is believed that management is involved, the matter should be reported to the Chief Executive or a Company Director.

Concerns are better raised in writing to formalise the process. Board Members/workers are encouraged to set out the background and history of the concern, giving names, dates and places where possible, and the reason why they are particularly concerned about the situation. The Company appreciates that people may feel uncomfortable raising their concerns in writing and in such circumstances, a telephone call or face to face conversation is strongly encouraged so that the issue can be raised and confidentiality and support available can be discussed.

The earlier Board members/workers express their concerns, the easier it is to take action.

Although the Board members/workers who raise the issue are not expected to prove the truth of an allegation, they will need to demonstrate to the person contacted why they believe there are sufficient grounds for concern.

Trade Union Representatives are permitted to raise a matter on a workers behalf. It may be useful to consider discussing concerns with a colleague first, it may be easier to raise the matter if there are two (or more) persons who have had the same experience or concerns.

Trade Union Representatives may be present during any meetings or interviews in connection with the concerns raised.

Where Board Members/workers do not feel comfortable speaking with their Manager, a member of HR, Senior Management, a Director or the Chief Executive, independent advice and information may be sought from the charity, Protect who seek to ensure that concerns about malpractice are properly raised and addressed in the workplace. Their website address is https://protect-advice.org.uk/ Telephone advice is available 9am – 5:30pm Monday to Friday on **0203 117 2520.**

Any matters raised internally must be notified to the HR team prior to an investigation commencing. HR will support to identify an appropriate investigating officer. The Head of HR should be made aware of all cases unless not appropriate to do so by nature of the concerns in which case an Executive Director should be informed.

3. What Action will be Taken?

The action taken by the Company will depend on the nature of the concern. The matters raised may:

- Be investigated internally
- Be referred to the Police
- Form the subject of an independent inquiry

In order to protect individuals and the Company, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take (see above). Concerns or allegations which fall within the scope of specific procedures (for example discrimination issues) will normally be referred for consideration under those procedures; HR will support to make this decision.

Some concerns may be resolved by agreed action without the need for investigation.

The Company will write to the member of staff/ Board member on receipt of a concern to acknowledge that the concern has been received. If not dealt with in this initial letter, the Company will write again to indicate:

- How it proposes to deal with the matter
- An estimate of how long it will take to provide a final response
- Advising whether further investigations will take place, and if not, why not
- Advising who has been appointed to conduct the investigation
- Advising where the outcome of the investigation will be sent internally for next steps – this will be subject to the nature of the concern being raised

The amount of contact between the persons considering the issues and the Board Member/worker will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought from the Board Member/worker.

When any meeting is arranged, the Board Member/worker will have the right, if they so wish, to be accompanied by a Trade Union representative or a colleague who is not involved in the area of work to which the concern relates.

The Company, where possible and subject to legal constraints, will keep the Board Member/worker informed about how the matter is progressing, how long the investigation may take and the outcome of any investigations.

4. How to take matters further

This procedure is intended to provide Board Members and Employees with clear and supportive procedure under which they feel able to raise concerns within the Company so that issues can be resolved satisfactorily. However, if all internal mechanisms to resolve the complaint have been exhausted and the member of Board/Employee does not feel the matter has been addressed appropriately, a "qualifying disclosure" should be made to external Prescribed Regulators.

A summary of the key Prescribed Regulators contacts can be located on Quip. Please note; this is not an exhaustive list, for further details contact the charity, "Protect" on their advice line 02031172520, or on their web site https://protect-advice.org.uk

If a Board Member/Employee feels the need to take the matter outside the Company, they must ensure that they do not disclose confidential information.

5. Whistleblowing vs Safeguarding

Some concerns raised by Board Members/workers may relate to safeguarding (for example, the safety and wellbeing of a child or adult at risk). Where this is the case, concerns must be reported and managed in line with the Calico Group Safeguarding Policy and procedures.

If you believe someone is at immediate risk of harm, take urgent action first (for example, call the emergency services) and then follow the Safeguarding procedure without delay. If your concern is primarily about organisational wrongdoing (for example, systemic failures, cover-ups, unsafe practices, fraud/corruption, or improper conduct) and is raised in the public interest, you should use this Whistleblowing Procedure. Where an allegation relates to the behaviour of a member of staff and also involves safeguarding, the Safeguarding procedure should be followed alongside any internal investigation, and HR will support in agreeing the appropriate route and investigating officer.

6. How we safeguard Whistleblowers

Victimisation or Harassment

The Company recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. The Public Interest Disclosure Act (1998) protects any whistleblowing workers who discloses their concerns in the public interest. The Company will not tolerate harassment or victimisation (including informal pressures) of a Board Member/Employees for raising a concern and will take protective and supportive actions where concerns are raised.

It is important to note that where disciplinary or redundancy procedures are already underway, they will not automatically be halted as a result of a Whistleblowing claim. However, each circumstance will be considered individually.

Mistreatment of a Whistleblower will be treated as a disciplinary offence and can lead to personal liability

Confidentiality

The Company will do its best to protect the identity of Board Members/Employees when they raise a concern and do not want their name to be disclosed. However, it must be appreciated that the investigation process may reveal the source of the information and a statement may be required as part of the evidence. Whilst statements may be anonymised, the author of the statement may be unavoidably evident in some situations.

Concerns expressed anonymously are much less powerful and can be harder to investigate, but they will be considered at the discretion of the Company.

In exercising discretion, the factors to be taken into account would include:

- the seriousness of the issues raised
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable source.

If the report suggests criminal activity and the case is to be pursued by the Police, the identity of the person reporting the details may be important at a later date if criminal proceedings are to be pursued effectively. Therefore, identification is preferred and will assist any investigation.

It may be possible to establish the truth about allegations from another independent source and the Company will seek to do this if this can be done without further involving the Whistleblower.

Untrue Allegations

If a Board Member/Employee makes an allegation, but it is not confirmed by the investigation, no action will be taken against them. If, however, allegations are considered to have been made maliciously or in bad faith, disciplinary action may be taken against them.

Allegations made maliciously or in bad faith include those which are trivial and do not have any substance and are made persistently and annoyingly for the wrong reasons e.g. simply to make trouble.

Learning and Actions

Any investigation where concerns are validated will be notified to Board as part of good governance and assurance practices unless matters pertain to a serving Board member.

The Investigating Officer will write a report of findings and recommendations and share this with their HR Business Partner. HR will work with relevant Company Leads/Directors/Executives (as appropriate) to share learnings and implement actions.

7. Review and Evaluation

The Whistleblowing Procedure will be reviewed periodically to ensure its effectiveness and compliance with employment law. This procedure was last reviewed in April 2026.