

Whistleblowing Policy

This policy applies to everyone who works for the EY Foundation (“EYF”), whether paid or unpaid, including employees, contractors, secondees, volunteers, and the young people whilst employed on EYF programmes. This policy runs alongside all existing EY Foundation policies including the Volunteering Policy, specifically for volunteers, Complaints Policy and EY Foundation Child and Vulnerable Adult Protection Policy.

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

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 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 processes 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.

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, 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.

Whistleblowing procedure

1. What to do if you wish to raise a concern about malpractice

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

If you wish to raise a concern about any other form of malpractice, contact one or more of the following designated responsible whistleblowing individuals/parties (contact details provided at the end of this document):

In order of priority

1. EYF CEO (Maryanne Matthews) or EYF Deputy CEO (Margaret Gibson)
2. EYF CFO (Mark Smith)
3. EYF People Champion (Catrin Morgan)
4. EYF Trustee (Nigel Halkes)
5. Independent external party (Charity Commission or Public Concern at Work)

Training for the above contacts will be provided where necessary.

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.

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. 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, make this clear to the 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 and any issues you may have about this will be discussed with you.

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

2. 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 Step 1 above. You should not take any further action unless otherwise advised by a designated responsible whistleblowing individual(s)/independent external party(parties).

3. 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. EYF CEO (Maryanne Matthews) or EYF Deputy CEO (Margaret Gibson)
2. EYF CFO (Mark Smith)
3. EYF Trustee (Nigel Halkes)
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.

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 concerns are not upheld, this should also 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 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 and may 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.

Further information, advice and contact details

Designated responsible whistleblowing individuals/parties:

1. EY Foundation Chief Executive (Maryanne Matthews)

mmatthews@eyfoundation.ey.com

+44 (0)20 7951 8448 or +44 (0)7920 813 081

EY Foundation Deputy Chief Executive Officer (Margaret Gibson)

mgibson@eyfoundation.ey.com

+44 (0) 141 226 7493

2. EY Foundation CFO (Mark Smith)

Mark.Smith1@eyfoundation.ey.com

+44 (0)207 980 9117

3. EY Foundation People Champion (Catrin Morgan)

Catrin.Morgan1@eyfoundation.ey.com

+44 (0)207 951 9755

4. EYF Trustee (Nigel Halkes)

nigel@halkes.co.uk

+44 (0)7802 483 822

5. Independent external party (Charity Commission or Public Concern at Work)

Charity Commission:

- a. Whistleblowing: whistleblowing@charitycommission.gsi.gov.uk
- b. Contact centre helpline: +44 (0)845 300 0218
- c. Serious incident helpline: +44 (0)300 065 2199

Public Concern at Work (Whistleblowing Charity):

- d. Whistleblowing advice line: +44 (0)20 7404 6609
- e. Whistleblowing advice line: whistle@pcaw.org.uk

Further advice for 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>