



HONEYCOMB
GROUP

**Whistleblowing and
Confidential Reporting Policy**

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Who's this for?	Honeycomb Group including subsidiaries
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Consultation with stakeholders	HR
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Data Protection Assessment (by DPO) & date	10 February 2025
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Owner (Executive Lead)	Executive Director Finance
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Approved by Board	11 th June 2025

Document Revision History

Version	Date	Description of Change	Author
1.0	Nov 21	Cyclical review	Commercial Finance Director
2.0	10/2/25	Scope widened to enable anyone to raise a concern. Additional wording and advice on how to raise a concern. New appendices added to provide guidance for managers and incorporating sections on malicious allegations, anonymous allegations, expands on how investigations will be raised, and notification. Reference to the Independent Agency for supporting Whistleblowers, Protect.	Governance and Data Protection Business Partner

1. Introduction and Purpose

Honeycomb Group is committed to the highest possible standards of openness, probity and accountability. In line with this commitment, we expect employees, and all others that work with us or for us, who have serious concerns about any aspect of our work to come forward and voice those concerns. It is recognised that most cases will have to proceed on a confidential basis.

2. Policy Aims and Objectives

This policy makes it clear that you can raise legitimate concerns without fear of victimisation, bullying or any adverse impact to your role at Honeycomb Group or your career.

It aims to:

- encourage you to feel confident about raising legitimate concerns
- explain how to raise concerns, or obtain advice before raising a concern
- explain how your concerns will be dealt with
- ensure that concerns are dealt with at an early stage and in an appropriate manner

All matters raised under the Whistleblowing and Confidential Reporting Policy will be treated in the strictest confidence and will be investigated thoroughly. If an individual raises a genuine concern under this policy, they will not be at risk of losing their position, nor will they suffer any form of detriment as a result. As long as the individual is acting in good faith and in accordance with this policy, it does not matter if they are mistaken. These assurances would not be extended to someone who maliciously raises a matter they know to be untrue.

3. Legislation

The Public Interest Disclosure Act 1998 (PIDA), sometimes known as the “Whistleblowers Act”, protects workers who raise concerns in a responsible way and so encourages employers to respond appropriately. Its main purpose is to protect employees who disclose information about their employer, which might otherwise be regarded as confidential from detrimental action. It is aimed at encouraging people to raise concerns about malpractice in the workplace.

Section 103a of the Employment Rights Act 1996 makes it automatically unfair to dismiss a worker for making a ‘protected disclosure’, even if they have less than 12 month’s service.

4. Related Policies

- Anti-Fraud and Bribery Policy
- Code of Conduct
- Gifts and Hospitality Policy
- Disciplinary and Grievance Policy
- Anti-Harassment and Anti-Bullying Policy
- Sexual Harassment Policy
- Safeguarding Policies – Adults/Children
- Data Protection Policy
- Equality & Diversity Policy

5. Scope



This policy applies to all Honeycomb Group employees (temporary and permanent), volunteers, apprentices, agency staff, work experience, board members, business partners, contractors and consultants.

The scope of this policy includes those who are not covered under the PIDA, however Honeycomb Group recognises that it is important that someone who is not protected by law can still make a disclosure and that there should be a mechanism available to them whereby they can raise concerns about possible malpractice or wrongdoing without leaving themselves open to possible victimisation.

6. Definitions

This Policy is intended to cover major concerns that may fall outside the scope of other Honeycomb Group policies and procedures, including concerns that you may have in relation to the following:

- fraud or suspected fraud
- money-laundering or suspected money laundering
- bribery
- corruption
- maladministration
- inappropriate abuse of authority
- health and safety risks, including risks to the public or employees
- damage to the environment
- the unauthorised use of public funds
- abuse or neglect of vulnerable people
- failure to deliver proper standards of service
- damaging personal conflicts at senior level
- sexual or physical abuse of customers, or safeguarding concerns which have already been raised internally but which you do not feel have been taken seriously
- any other unethical conduct or instances of organisational wrongdoing

Reports which relate to Fraud, Money Laundering, Bribery or Corruption will be investigated in line with the Incident Response Plan, Appendix 3 of the Anti-Fraud and Bribery Policy.

7. Disclosures as defined in the Public Interest Disclosure Act

Some disclosures may also be referred to as “protected disclosures”, as defined by the PIDA.

For protected disclosures they must be:

- Disclosures of information
- Qualifying disclosures*
- Made in accordance with the permitted methods of disclosure

*Qualifying disclosures are disclosures that, the reasonable belief of the individual making it, reveals genuine concerns about:

- an actual or potential criminal offence
- a failure to comply with a legal obligation, such as negligence, breach of contract or breach of administrative law
- a miscarriage of justice
- the endangerment of Health & Safety
- damage to the environment

- deliberate concealment of any matter failing within any one of the above

If a concern cannot be addressed using the Honeycomb Group's Grievance Policy, or a situation is inappropriate for the Grievance Policy to be used, colleagues can use the confidential reporting process to express their concern confidentially. It may be difficult to decide whether a particular concern should be raised under this policy or the Grievance Policy or under both. If an individual has any doubt as to the correct route to follow, it is encouraged to raise the concern under this policy and then it will be decided how the concern should be dealt with.

8. Communication

Honeycomb Group will make sure that an individual knows how to recognise the following problems and that they understand the effects they may have on the organisation, their job and the service provided through our communication and mandatory reads for policies and our core training modules on the Learning and Development platform.

- Fraud, corruption and malpractice
- Abuse or neglect of vulnerable people including any safeguarding concerns
- Failure to deliver proper standards of service
- Damaging personnel conflicts at senior level
- Bullying, discrimination, harassment or victimisation in the workplace

9. Raising and Reporting a Concern

Appendix 1 of this Policy sets out the steps of how to formally raise a concern. Make sure you are clear before raising a concern, do some preparation and consider seeking advice beforehand.

9.1 Preparation

- Think about the reasons why the behaviour, activity or action in question has caused concern. You should be able to justify any concern you raise.
- Brief notes might be helpful.
- Be mindful of keeping your notes secure and what might happen if they are lost, or someone else comes across them.
- Read Honeycomb Group's Disciplinary and Grievance Policy to check that they do not already provide a way for your concern to be addressed.
- Consider if the matter may be more appropriately raised in accordance with the Complaints Policy.

9.2 Independent Advice

The charity "Protect", offers a free and confidential telephone service for anyone who is considering raising a confidential or 'whistleblow' report. They will discuss your issue with you confidentially and give you advice on how best to raise your concern and offer independent support while your concern is being investigated. You can call their free telephone helpline services on 020 3117 2520, email or visit their [website](#).

9.3 Internal Advice



Consider if an informal, internal discussion would be useful, before you raise your concern. You could consider approaching the following people for a confidential discussion to help you decide whether you should raise a report under this Policy:

- Line Manager
- Head of Service or any Executive Director
- Executive Director Finance (Company Secretary)
- HR (Strategic Lead – People)

It is not necessary that you prove the malpractice or misconduct that you are alleging, you are simply raising a reasonable suspicion.

10. External Agencies

Contact with an external agency to express concerns should be considered a last resort and colleagues are encouraged to raise concerns internally first.

It is intended that this policy should give an individual the reassurance they need to raise concerns internally. However, if an individual feels the issue lies outside what can be dealt with internally, a disclosure could be made externally. The law recognises in some circumstances it may be appropriate for an individual to report their concerns to an external body such as a regulator.

It will very rarely, if ever be appropriate to alert the media. However, Honeycomb Group would strongly recommend seeking advice from the independent agency, Protect, prior to doing so. See 9.2 above for details.

11. Investigation of a Concern

We will investigate all legitimate concerns raised under this Policy. This may include invoking our disciplinary procedures if necessary or seek the apprehension and prosecution of offenders via law enforcement if necessary.

All matters raised under this policy will be treated in the strictest confidence and will be investigated thoroughly.

As set out in the Anti-Fraud and Bribery Policy, the Incident Response Plan will be followed when dealing with confidential reports which relate to:

- Theft and suspected theft
- Fraud and suspected fraud
- Bribery and suspected bribery
- Money laundering and suspected money laundering

This is because activity in these areas would result in specific criminal offences being committed and so any internal investigation must be carried out by designated individuals.

A copy of the Incident Response Plan can be found at Appendix 3 of the Anti-Fraud and Bribery Policy.

For all other confidential reports received, the following appendices below should be followed.



Appendix 1 provides further guidance on how Honeycomb Group will respond to and investigate confidential concerns that are raised.

Appendix 2 provides further guidance for employees, executive directors and board members who have been notified of a concern.

12. Protecting the Individual

Honeycomb Group will not tolerate harassment or victimisation of anyone raising a genuine concern under this policy. If an individual requests that their identity be protected, all possible steps will be taken to prevent the individual's identity becoming known. If the situation arises where it is not possible to resolve the concern without revealing the individual's identity (e.g. if the individual's evidence is needed in court or disciplinary hearing, or if it necessary for anyone investigating the concern to know the individual's identity), the best way to proceed with the matter will be discussed with the individual.

Individuals should be aware that by reporting matters anonymously, it will be more difficult for the organisation to investigate them, to establish whether allegations are credible, to protect the individual and to give them feedback. Honeycomb Group will consider anonymous reports, which will still be dealt with in accordance with this policy but does not encourage employees to make reports anonymously.

Individuals who raise a genuine concern under this policy will not be at risk of losing their job or of suffering any form of detriment or reprisal as a result, even if the concern turns out to be mistaken. Honeycomb Group will not tolerate the harassment or victimisation of anyone raising a genuine concern and considers it a disciplinary matter to victimise anyone who has raised a genuine concern.

Whistleblowers must not be threatened or retaliated against in any way. If they are, such conduct will be subject to disciplinary action. In some cases, the whistleblower could have a right to sue the individual issuing threats and/or retaliations personally for compensation at an employment tribunal. If an individual believes they have suffered such treatment, they should inform through the appropriate channels and outlined in **Appendix 1**. If they feel the matter is not remedied, they should raise a grievance formally using the grievance procedure.

Honeycomb Group will ensure that all matters relating to this policy, and which fall within the scope of current data protection legislation, will be adhered to.

13. Review and Monitoring

This policy is reviewed every 3 years and approved by the Audit and Risk Committee. A review may be required earlier if there is a legislative or regulatory requirement or significant change.



Appendix 1: Procedure for Reporting and Investigation of Whistleblowing Concerns and Confidential Reporting

As set out in the Anti-Fraud and Bribery Policy, the Incident Response Plan must be followed when dealing with confidential reports which relate to:

- Theft and suspected theft
- Fraud and suspected fraud
- Bribery and suspected bribery
- Money laundering and suspected money laundering

This is because activity in these areas would result in specific criminal offences being committed and so any internal investigation must be carried out by designated individuals.

A copy of the Incident Response Plan can be found at Appendix 3 of the Anti-Fraud and Bribery Policy.

For all other confidential reports received, the process below should be followed.

1.1 Employees and Volunteers

Concerns can be raised verbally or in writing. If you wish to raise a concern in writing then you should give details of names, dates and occurrences where possible and provide details of your concerns about the situation.

In most cases it should be reasonable for concerns to be raised with your immediate line manager. If not possible, you can raise with:

- Head of Service or any Executive Director
- Chief Executive
- Executive Director Finance (Company Secretary)
- HR (Strategic Lead – People)

1.2 Board Members

As a first step you should raise your concerns with the Senior Independent Director (SID). Where this is not possible, concerns should be raised with the Chief Executive or the Executive Director Finance (Company Secretary).

1.3 Malicious or frivolous allegations

Anyone who abuses the Policy by making malicious or frivolous allegations or for their own personal gain will be subject to disciplinary action.

If you make an allegation in good faith but it is not confirmed by subsequent investigation, no action will be taken against you.

1.4 Anonymous Allegations

You are encouraged to put your name to your allegation wherever possible. Anonymous allegations may still be investigated but it may be more difficult for the organisation to examine them fully.

Where possible, Honeycomb Group will try and maintain your confidentiality however there may be circumstances or situations where this will not be possible. If it is not possible to



maintain your confidentiality, this will be made clear to you in advance, before any report is forwarded or shared internally for investigation.

1.5 Investigation of Confidential Concerns Raised

Initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take and who will lead the investigation.

The Investigation Lead will need to be appropriate to the concern that has been raised and will need to have the appropriate level of authority to ensure that access to systems, data and information can be obtained and safeguarded. The Investigation Lead will not normally be the individual's reporting line, to maintain the integrity, independence and impartiality of any investigation conducted.

Honeycomb Group's approach will be informed by three main obligations:

1. To investigate allegations thoroughly
2. To provide support and protection to the individual(s) who have raised concerns, whilst seeking (where possible) to safeguard their right to confidentiality
3. To act in the public interest

If concerns of allegations fall within the scope of other policies or procedures that Honeycomb Group has (i.e. disciplinary or grievance) then the report raised will normally be considered under the relevant procedures. Where this is the case the individual raising the confidential report will be clearly told why another policy is more appropriate or suitable for dealing with the concern that has been raised.

Once a suitable investigation lead has been determined, they will write to the person who has raised the confidential report. They will do this within 10 working days of a concern being raised. Their communication will acknowledge the concern received, indicate how the organisation proposes to deal with the matter, give an estimate of how long it will take to investigate and provide a final response and state whether further investigations will take place and if not, the reason why.

During any investigation the level of contact with the person who has made the confidential report will depend on the nature of the matter raised. It may be necessary to seek further information from the individual who has raised the concern or others, and an investigation may take some time to complete depending on the circumstances.

Honeycomb Group will do whatever it can to minimise any difficulty that individuals may face as a result of raising a confidential report. The policy makes clear that those who raise confidential reports will be protected from any reprisal, bullying, victimisation or adverse impact on their role at Honeycomb Group or their career as a result of raising a legitimate concern.

If an individual is required to give evidence in criminal or disciplinary proceedings, arrangements will be made to enable individuals to receive appropriate advice about the process involved. Subject to any legal constraints, Honeycomb Group will inform the person who has raised the confidential report about the outcome of any investigation.

If a Board Member has concerns about the board or the organisation that cannot be resolved through this process, in line with section 4.5(3) of the NHF Code of Governance 2020 these concerns must be shared with the board and formally recorded.

Appendix 2: Guidance for Employees, Executive Directors and Board Members on Notification of Whistleblowing Concerns or Confidential Reporting



When approached by a person who has a concern or wishes to raise a confidential report, you should first consider whether you have any conflict of interest. The Executive Director Finance (Company Secretary) will be able to provide further advice in confidence, if you are unsure.

If you consider that you are conflicted, you should suggest a more appropriate individual for that person to speak to such as your Head of Service or any Executive Director, the Company Secretary or the Strategic Lead – People (HR).

The confidentiality of the person raising the concern must be respected as far as possible. At the same time, it is important to advise them they will be protected from any reprisal, bullying, victimisation or adverse impact on their role at Honeycomb Group.

It is important to be mindful of legitimate concerns the whistleblower may have about their own safety and/or career and to reassure them that they will be protected from any reprisal, bullying, victimisation or adverse impact on their role at Honeycomb Group or their career as a result of raising a legitimate concern.

Ensure the whistleblower is aware that raising unfounded allegations maliciously or frivolously is a disciplinary matter.

Offer to report back about the outcome of the investigation and where possible, on any action that is proposed.

Notify the Company Secretary that a Confidential Report has been received. An investigation will be arranged. This will depend on the nature of the concern raised and what or who would be the most suitable way to deal with the investigation.

- If the concern relates to the Chief Executive, you should contact the Company Secretary or the Senior Independent Director (SID).
- If the concern relates to the Chair of the Board or any Board member you should contact the Company Secretary for advice about how to proceed. Any investigation into the conduct of the Chair of the Board or any Board member must be led by the Senior Independent Director.
- If the concern relates to the Senior Independent Director, then the investigation will be led by the Chair of the Board, unless they are also implicated in the wrongdoing.
- If both the Chair of the Board and the Senior Independent Director are implicated in wrongdoing, then the investigation will be led by any member of the Board who is not conflicted, or the organisation's internal or external auditor.

Deterring employees from raising a concern under the Whistleblowing and Confidential Reporting Policy or persuading or inducing them not to raise a concern or proceed with a concern, is a serious probity concern and a disciplinary offence which may lead to termination of employment or a service contract