



# BGUK & Bupa Group Functions **Speak Up**

01 February 2024

Business Use Only



| **Our values** | **Brave** | **Caring** | **Responsible**

# Introduction

**Helping people live longer, healthier, happier lives and making a better world is Bupa’s purpose, it starts with our people.**

The Bupa Code acts as our moral compass and empowers us to stand up for what's right for our customers, residents, patients, and each other. However, all businesses face the risk of things going wrong and people behaving in ways that aren't acceptable.

Everyone connected to Bupa must do the right thing and speak up if something is wrong that may affect our customers, people, Bupa, the public, or the environment. This includes behaviour that's not in line with the Bupa Code or breaches our internal policies, standards, procedures, guides, regulatory requirements, or laws.

Speak Up is Bupa’s whistleblowing service. It can be used by anyone who has a concern either about Bupa or individuals and organisations providing goods/services to Bupa. It makes sure people can raise genuine concerns about wrongdoing, misconduct, or risk of harm in confidence and anonymously, if preferred. We take concerns seriously and the people who raise them can be confident they'll be heard, protected, and supported. This document explains our approach to Speak Up, when you should Speak Up, and how to Speak Up.

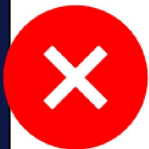
## Scope

**This document applies to everyone in the BGUK market unit and Bupa Group Functions in the UK, including all non-employees, e.g. bank workers, agency workers, contractors and self-employed team members.** It doesn't form part of your contract and will be reviewed from time to time to make sure it reflects Bupa’s legal/regulatory obligations and business needs.



In Scope:
Bupa Health Services (Cromwell & Clinics)
Bupa Care Services
Bupa Dental Care (UK, ROI)
UK Insurance
Bupa Global (UK and BG Regions outside of the UK)
BGUK Functions (UK)
Bupa Group Functions (UK)

Out of Scope:
N/A



**This is a mandatory guide that must be complied with at all times.** If there's a breach, we won't deliver the best outcomes for our people or our customers and risk exposing Bupa to prosecution, reputational damage and/or financial penalty. Appropriate action may be taken in accordance with this or any other appropriate document where it applies, e.g. our Disciplinary Standard or local equivalent.



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## When to use Speak Up

If you see an unsafe practice risk or wrongdoing, you should decide whether you can address it there and then. A firm, polite challenge is sometimes all that's needed. If not, you should raise your concern with your manager, another manager, or through an appropriate process.

Speak Up provides a way of raising concerns you don't feel able to raise with your manager, another manager, or through any other appropriate process. It's also there if you've raised your concerns using these routes but don't believe your concerns have been addressed.

Please consider whether there's another, more appropriate, procedure available to raise your concern before you use our Speak Up service. For example, concerns or a complaint relating to your own personal circumstances (i.e. the way you've been treated at work) should be raised under the appropriate People process (e.g. using the issue resolution procedure). We want Bupa to be a place where our people speak up whenever they have a concern about wrongdoing or dangers at work, including but not limited to:

- Health and safety risks, including risks to Bupa people, customers, patients, residents, and their families.
- Bribes or kickbacks.
- Fraud and corruption.
- Questionable financial accounting or tax arrangements.
- Information security breaches.
- Breaches of law, regulation, and/or a professional code – including criminal conduct.
- Serious breaches of Bupa policies, standards, procedures, and/or guides.
- Actions or behaviours which could damage Bupa's reputation.
- Modern slavery concerns.
- Environmental concerns.
- Actual or potential conflicts of interest.
- Anti-competitive behaviour.
- Other dishonest or unethical conduct.
- Concerns about wrongdoing, misconduct or risk of harm in Bupa's supply chain, i.e. by those individuals / organisations providing goods and/or services to Bupa.
- Actions intended to hide or cover up any of the above.



## How to Speak Up

If you feel your manager or another manager hasn't addressed your concern or you'd prefer not to raise it with them for any reason, please report it to Speak Up. You mustn't investigate your concern yourself or try to prove it's well-founded, report it straight away.

You can report a concern to Speak Up or seek advice and ask questions about Speak Up by:

- calling the Speak Up hotline on **+44 (0)808 234 6936**. The hotline is available free of charge, 24/7, in all countries and in a language of your choosing. It's provided by an independent third-party specialist provider of whistleblowing services, NAVEX Global.
- by reporting online at [www.bupa.com/speakup](https://www.bupa.com/speakup).
- by contacting your **Speak Up Officer**:
  - **BGUK**  
**Nickie Titterington** – by phone on **+44 (0)113 360 6205**, or email to [nickie.titterington@bupa.com](mailto:nickie.titterington@bupa.com) or  
**Rachel Booth** – by phone on **+44 (0)113 360 6209**, or email to [rachel.booth@bupa.com](mailto:rachel.booth@bupa.com)  
Please note, colleagues in the European Union can also request a face to face meeting to discuss their concerns.
  - **Bupa Group Functions**  
Sally Thornton – by phone on **+44 (0)113 360 8259**, or email to [sally.thornton@bupa.com](mailto:sally.thornton@bupa.com)
- by contacting a member of our **Speak Up Oversight Group**:
  - **Penny Dudley** (Chief Legal Officer) – by phone on **+44 (0)203 314 1999**, or email to [penny.dudley@bupa.com](mailto:penny.dudley@bupa.com)
  - **Nigel Sullivan** (Chief People Officer) – by phone on **+44 (0)203 314 1411**, or by email to [nigel.sullivan@bupa.com](mailto:nigel.sullivan@bupa.com)
  - **David Fletcher** (Chief Risk Officer) – by phone on **+44 (0)203 314 1712**, or by email to [david.fletcher@bupa.com](mailto:david.fletcher@bupa.com)
  - **Jeremy Eagles** (Chief Internal Auditor) – by phone on **+44 (0)203 314 1412**, or by email to [jeremy.eagles@bupa.com](mailto:jeremy.eagles@bupa.com)



We hope you'll feel able to Speak Up openly. But, if you'd prefer to be anonymous, you can raise your concern by phoning our Speak Up hotline or reporting online (see above). This'll allow us to acknowledge your concern, ask any questions we may have, and provide appropriate updates and feedback through the platform/ telephony service provided by NAVEX Global. When you raise your concern in this way, you'll be provided with a unique report key and asked to set up a password which will allow you to stay in touch with the Speak Up Team whilst remaining anonymous. Please take care to make a note of your report key as, without it, you won't be able to access the updates we'll provide and, if we don't have any way of contacting you, our investigation into your concern may be very difficult or even impossible. If you lose your report key, please raise your concern again and we'll bring you up to date.

## What happens next

We take all concerns reported to us seriously and acknowledge them, in writing, within 5 working days of receipt.

We will investigate them using existing processes and procedures, as appropriate, and do so within 30 days unless there's a good reason. If the investigation is going to take longer than 30 days, you'll be notified.

All concerns are managed confidentially, so far as possible. If it's necessary for anyone to know the identity of the Speak Up Reporter, we'll make every effort to agree that in advance, subject to our legal/regulatory obligations.

We provide progress updates and feedback to the individual who raised the concern, track the progress of each case, and act when required to make sure issues are appropriately addressed, and any lessons learnt. Please also be aware that sometimes the need for confidentiality may stop us from giving you specific details of the investigation, e.g. any disciplinary action taken as a result. You should treat any information you're provided with about the investigation as confidential.

Any decision to close or transfer a concern out of Speak Up to another, more appropriate, process will be communicated to you as soon as possible.

We report actual or suspected breaches of law to the relevant law enforcement agencies, where appropriate.

We carry out a review in cases where the individual raising the concern is dissatisfied with the way it has been handled. If you want to request a review, please do so through the usual Speak Up reporting channels or directly to the Chief Legal Officer.



We don't allow decisions concerning speaking up within Bupa to be influenced by race, sex, pregnancy or potential pregnancy, maternity, colour, sexual orientation, gender identity/expression/history, transgender or transsexual status, political belief or activity, religion, marital status, caring responsibilities, parental status, breastfeeding, irrelevant criminal or medical record, national or ethnic origin, disability, age, citizenship or membership of a representative body, except where required or justified by any applicable laws.

If we conclude that an individual has made false allegations maliciously, they may be subject to disciplinary action up to and including summary dismissal. In those circumstances, we may also inform the person against whom the allegations have been made.

We are committed to handling the personal information of our people in the right way. Speak Up information and records will be managed in accordance with our information management and privacy policies. For further information, please read our Employee Privacy Notice. Depending on where you work, you'll find this by using the following links:

- **BGUK Functions, Group, Health Services, and Insurance**
- **Care Services**
- **Bupa Dental Care**
- **BG Regions (outside the UK)**



## Here to support you

We understand that speaking up can be difficult and requires us to live our values. We encourage openness and will support people who raise genuine concerns, even if they turn out to be mistaken. We'll take appropriate steps to protect anyone who reports or assists with the investigation or resolution of a concern from unfair treatment.

We appreciate that being the subject of an investigation into a concern can be worrying and we provide appropriate support in these circumstances as well.

We don't accept the unfair treatment of anyone who raises or takes part in the investigation or resolution of genuine concerns raised through Speak Up. Anyone found to have taken retaliatory action will be subject to disciplinary action and may expose themselves to personal legal liability.

If you feel that you, or someone else, has suffered poor treatment due to involvement in the Speak Up process, please report your concerns through the usual Speak Up reporting channels or directly to the Chief Legal Officer.

Healthy Minds and the Employee Assistance Programme (EAP) is a confidential free service for support and advice on emotional and mental health concerns, as well as practical issues such as finances and legal matters.

### You can make contact using:

- **(0)345 600 2007** if you work in any part of BGUK or Bupa Group Functions in the UK.
- **(0)180 060 6608** if you work in the Republic of Ireland.
- **[login.lifeworks.com](https://login.lifeworks.com)** to download the app and access your account if you're based in one of our Bupa Global regional offices outside of the UK and ROI. Within your account you'll be able to send an invite to up to five family members to join LifeWorks. Your loved ones will receive the same support services as yourself.





## Reporting concerns externally

Speak Up provides a way of reporting, investigating, and responding to any wrongdoing or risk of harm at Bupa internally. In most cases you shouldn't find it necessary to speak to someone outside of Bupa.

The law or a professional body may say that in some circumstances it's appropriate for you to report your concerns to a body outside of Bupa, such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone outside of Bupa. You can take advice from Protect, an independent charity providing free, confidential legal advice on raising concerns at work. You can call **Protect** on **+44 (0)203 117 2520** or visit their [website](#) for further information.

Parts of BGUK and Bupa Group Functions are regulated by the Financial Conduct Authority (FCA) and Prudential Regulation Authority (PRA). You can report a concern to the:

- **FCA** by calling **+44 (0)207 066 9200** between 10am and 3pm, Monday to Friday, or leave a message. You can also email [\*\*whistle@fca.org.uk\*\*](mailto:whistle@fca.org.uk) or complete an online form accessed via the FCA website.
- **PRA** by calling **+44 (0)203 461 8703** during office hours, emailing [\*\*whistleblowing@bankofengland.co.uk\*\*](mailto:whistleblowing@bankofengland.co.uk), or writing to **IAWB (Legal Directorate), Bank of England, Threadneedle Street, London, EC2R 8AH.**

You don't need to have raised your concern internally at Bupa before you contact either the FCA or PRA and you don't have to tell Bupa you've raised a concern with them. You can also raise a concern with both Bupa and the FCA and/or PRA at the same time.

### In the Republic of Ireland

If you'd like to take advice from someone who doesn't work at Bupa before using our Speak Up service, you can take advice from **Transparency International Ireland (TII)**, the largest not-for-profit organisation in Ireland providing advice in relation to whistleblowing.

TII is the Irish branch of the worldwide organisation Transparency International. They operate a free Speak Up helpline which offers information, referral advice and advocacy support to people looking to report wrongdoing, or to witnesses and victims of corruption or other wrongdoing. TII can offer workers who wish to make a protected disclosure an appointment with the Transparency Legal Advice Centre (TLAC). Their Speak Up helpline is open Monday to Friday, 10am – 6pm on **+353 1800 844 866**.

Concerns can also be reported to the **Central Bank of Ireland (CBI)** on **+353 1890 130 014** Monday to Friday, 9.30am – 5.00pm, by leaving a message (disclosing contact details) on voicemail, by emailing [\*\*confidential@centralbank.ie\*\*](mailto:confidential@centralbank.ie), or by writing to **Protected Disclosures Desk, Central Bank of Ireland, PO Box 11517, Spencer Dock, Dublin 1, D01 W920.**



## DIFC, UAE: Bupa Global Middle East (DIFC) Ltd.

We encourage you to report your concerns using the means internally available within Bupa. This includes reporting to the compliance officer, your people partner, line manager or using the Speak Up channel. There may be circumstances where you believe it's appropriate, or you may prefer, to report the concerns directly to the regulator or to another relevant authority. Nothing in this guide prohibits you from reporting possible violations of law, regulation or rule to any supervisory authority, governmental or regulatory agency.

You can report a regulatory concern directly to the **Dubai Financial Services Authority (DFSA)** by emailing [whistle@dfsa.ae](mailto:whistle@dfsa.ae). You don't need to have raised your concern internally at Bupa before you contact the DFSA, and you don't have to tell Bupa that you've raised a concern with them. You can also raise a concern with both Bupa and the DFSA at the same time.



## Help for managers

You can access further information specific to managers, including our Speak Up Manager Guide. Depending on where you work, you'll find this by using the links below:

- **Functions, Group, Health Services, and Insurance**
- **Care Services**
- **Bupa Dental Care**
- **Bupa Global Regions (outside of the UK)**

## Associated documents and resources

The following guidance documents and/or resources are available:

- Speak Up Manager Guide
- Disciplinary Standard, or local equivalent
- Issue Resolution Guide/Manager Guide
- Inclusion & Diversity Standard, and guide
- WorkVivo Working at Bupa space
- WorkVivo Managing at Bupa space
- Knowledge Base (Bupa Dental Care)
- BG EEA Sharepoint (BG DAC in ROI)



Document Control	
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Version Control (incl. only current and prior version details)				
Version No	Author	Effective From	Next Review	Changes since prior version
0.1	Nickie Titterington	DRAFT	DRAFT	Refreshed language, look, and feel, alongside the transition from a policy to a guide/document (IMS strategy). Majority content has been lifted from Speak Up Policy 2022 however order and grouping of content has been amended to improve user experience with low level smart navigation introduced.
0.2	Nickie Titterington	DRAFT	DRAFT	Updated all Knowledge Base and WorkVivo links where appropriate to a more specific URL.
0.3	Nickie Titterington	DRAFT	DRAFT	Final version.
0.4	Nickie Titterington	DRAFT	DRAFT	Review with Heather O'Mara (People Policy Consultant). Non-material changes to content in line with Bupa tone of voice. Re-formatting to look and feel.
0.5	Nickie Titterington	DRAFT	DRAFT	Creation of internal/external links where appropriate.
0.6	Heather O'Mara	15/01/2024	DRAFT	For PRB/Dental PPF, Exec Sponsor approval.
1.0	Heather O'Mara	01/02/2024	01/02/2026	Updated ROI contact number for Healthy Minds. Final version for publishing.



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