

Speak Up

Group Functions Local Policy

1. Why is speaking up important?

1.1. Consistently achieving high standards in the way we run our business helps us achieve the right outcomes for Bupa, our customers and our people, ultimately ensuring we deliver our purpose: *longer, healthier, happier lives*. At Bupa we are committed to conducting our business responsibly and with honesty and integrity. However, all businesses face the risk of something going wrong or people behaving in ways which are not appropriate or acceptable. That's why a culture of openness and accountability is so important. We also need to have a framework in place to enable our people to report issues and concerns if they are not able to raise those concerns with their manager or they believe that their concerns have not been dealt with appropriately. Also, some of our people are bound by professional codes of practice that require them to highlight misconduct or malpractice to a relevant professional body.

1.2. The aims of this policy are to:

- provide a fair and consistent framework within which you are encouraged to speak up, in a responsible way, about any concerns you have as soon as possible, in the knowledge that those concerns will be taken seriously, investigated and responded to appropriately and any request for confidentiality respected;
- provide you with guidance on how to speak up; and
- reassure you that you are able to raise genuine concerns without fear, even if you turn out to be mistaken.

1.3. Bupa's people policies, systems and processes support our business by treating all of our people in a fair way. Decisions concerning speaking up within Bupa will not be influenced by race, sex, pregnancy or potential pregnancy, 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.

1.4. This policy does not form part of any individual's contract with Bupa and it may be amended at any time.

2. Who is covered by the policy?

This policy applies to everyone working at all levels of Bupa within Group Function including senior managers, officers, directors, employees, consultants, contractors, trainees, homeworkers, part time and fixed term workers, work experience students, casual and agency staff (together referred to as our people in this policy).

3. What is speaking up?

3.1. We want Bupa to be a place where our people speak up whenever they have a concern about wrongdoing or dangers at work. This may include but is not limited to:

- Health and safety risks, including risks to customers (including patients, residents and their families) as well as other people working at Bupa;
- Bribes or kickbacks;
- Information security breaches;
- Damage to the environment;
- Questionable accounting;
- Fraud and corruption;
- Serious breaches of Bupa's policies and/or procedures;
- Breaches of the law, regulation or a professional code;
- Actions or behaviour which could damage Bupa's reputation;
- Miscarriage of justice;
- Breaches of modern slavery legislation
- Other unethical conduct;
- Actions which are intended to hide or cover up any of the above.

3.2. Please consider whether there is another, more appropriate, procedure under which to raise your concern. For example, any complaint relating to your own personal circumstances (such as the way you have been treated at work) should be dealt with under our Grievance Procedure. If you have already followed another procedure but are not satisfied with the way your concern was dealt with you can raise it under this procedure.

3.3. If you need help deciding if the concern you have should be raised under this policy you can speak to:

- Your manager;
- Your local Speak Up Officer:
 - Sally Thornton, Speak Up Officer and Head of Legal, Employment & Privacy
 - **T:** +44 (0)113 360 8259 **M:** +44 (0)7736 699 982 **E:** sally.thornton@bupa.com
- NAVEX Global, an independent company which is our partner in providing telephone and web reporting services for Speak Up matters. NAVEX Global is a trusted partner managing the whistleblowing, ethics and compliance hotlines for over 10,000 organisations worldwide. You can contact NAVEX Global through the Speak Up website at www.bupa.com/speakup or call NAVEX Global directly on 0808 234 6936.

4. What to do if you want to speak up

4.1. If you see an unsafe practice, risk or wrongdoing, decide whether you can tackle it yourself, there and then. A firm, polite challenge is sometimes all that is needed.

4.2. If not, we hope that in many cases, you will be able to raise any concerns with your manager or, where this is not possible, a more senior manager. You may speak to them or write to/email them if you prefer. They may be able to agree a way of resolving your concern quickly and effectively.

4.3. Where you feel that a manager has not addressed your concern, or you prefer not to raise it with them for any reason, you can report it to one of the following:

- Your Speak Up Officer - Sally Thornton

T: +44 (0)113 360 8259 **M:** +44 (0)7736 699 982 **E:** sally.thornton@bupa.com

- NAVEX Global, an independent company which is our partner in providing telephone and web reporting services for Speak Up matters. NAVEX Global is a trusted partner managing the whistle blowing, ethics and compliance hotlines for over 10,000 organisations worldwide. You can contact NAVEX Global through the Speak Up website at www.bupa.com/speakup or call NAVEX Global directly on 0808 234 6936
- One of the people named in the table below:

Name	Business Title	Contact details
Penny Dudley	Chief Legal Officer	T +44(0)20 7656 2313 M +44(0)7850 166 826 E penny.dudley@bupa.com
Nigel Sullivan	Chief People Officer	T +44(0)2076562275 M +44(0)7788781054 E nigel.sullivan@bupa.com
David Fletcher	Chief Risk Officer	T +44(0)2076562635 E david.fletcher@bupa.com
Jeremy Eagles	Chief Audit Officer	T +44 (0)203 314 1412 M +44 (0)785 138 3169 E jeremy.eagles@bupa.com

If you want to speak up confidentially (i.e. you do not want us to share your name with anyone without speaking to you about it first) please make that clear and we will make every effort to keep your name secret wherever and whenever possible. If it is necessary for anyone investigating your concern to know who raised it we will discuss this with you.

4.4. We will let you know we have received your concern(s) and, where appropriate, a conversation will be arranged with you to discuss your concern(s).

5. What to do when someone speaks up

We hope that, in many cases, you will be able to raise any concerns with your manager or, where this is not possible, a more senior manager and that the concern can be resolved quickly and effectively. If you are a manager who has had a concern reported to you which you cannot resolve or you do not think that it is appropriate for you to deal with, please contact your Speak Up Officer as soon as possible for support.

6. Confidentiality and anonymity

6.1. We hope that you will feel able to speak up openly under this policy. If you want to speak up confidentially we will make every effort to keep the fact that you raised the concern a secret. If it is necessary for anyone investigating your concern(s) to know that you raised it, we will discuss this with you.

- 6.2. You may make reports anonymously but we do encourage you to give your name as proper investigation may be more difficult or impossible if we cannot ask you questions about your concern. If you do want to report a concern without giving your name please do so to NAVEX Global.
- 6.3. If you are concerned about being treated badly if someone finds out that you have raised a concern, supported someone who has raised a concern or taken part in the investigation or resolution of a concern, please be assured that you are protected against such poor treatment when you report genuine concerns. Please report any concerns you have about poor treatment to your manager or your Speak Up Officer.

7. Advice

You can take advice on speaking up from your Speak Up Officer.

If you feel you would like to take advice from someone who does not work at Bupa before speaking up or if you believe that you may be treated badly or that the concern you report may be covered up, you can take advice from Protect, an independent charity which provides free, confidential legal advice on raising concerns at work. You can contact Protect by:

- Phoning (020) 3117 2520 (* option 1)
- Emailing: whistle@protect-advice.org.uk

Information is also available on the Protect website, the address for which is <https://protect-advice.org.uk>.

8. Investigation and outcome

- 8.1. Once you have spoken up we will, as soon as possible, decide whether this or another Bupa policy/procedure (e.g. the Grievance Procedure) applies and how any investigation should be carried out. You will be informed of the outcome of that assessment. You may be asked to attend one or more meetings to provide further information and may bring a colleague with you. You and your companion should treat any information about your concern and the investigation as confidential.
- 8.2. In some cases, we may ask either one person or a team of people to investigate your concern including colleagues with relevant experience or specialist knowledge of the subject matter. Any investigation will be carried out in a fair and timely way. We expect all of our people to co-operate fully, openly and honestly in relation to any investigation. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing/danger. We are committed to implementing such findings and recommendations.
- 8.3. We will aim to keep you informed of the progress of the investigation and its likely timescale. The length of time needed to investigate will depend on the concern(s) raised. However, if the investigation is going to take longer than one month, you will be notified of this by the Speak Up Officer. Please also be aware that sometimes the need for confidentiality may stop us from giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

9. What can you do if you are not satisfied with the outcome?

- 9.1. We will always try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.
- 9.2. If you are not happy with the way your concern has been handled you can raise it with either your Speak Up Officer or Penny Dudley, Chief Legal Officer

T: +44(0)20 7656 2313 **M:** +44(0)7850 166 826 **E:** penny.dudley@bupa.com

10. Protection and support for our people

- 10.1. We understand that people who speak up are sometimes worried that they will be treated badly because they have done so. We encourage openness and will support people who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 10.2. We also appreciate that being the subject of an investigation into a concern can be worrying and will provide appropriate support in these circumstances also.
- 10.3. We will not accept the unfair treatment of any person who raises, or takes part in the investigation of, a genuine concern. Unfair treatment includes dismissal, disciplinary action, bullying, threats and any other poor treatment connected with speaking up. If you feel that you have suffered any such treatment as a result of speaking up, you should inform your manager, your Speak Up Officer or the Chief Legal Officer.
- 10.4. You must not threaten or react negatively against those who speak up or take part in the investigation of concerns in any way. If you are involved in such conduct you will be subject to disciplinary action. In some cases, the person who has spoken up could have the right to sue you personally for compensation.
- 10.5. If you would like to speak to a professional team about anxiety or any other mental health issue, you can contact Healthy Minds which is a confidential, free of charge service for Bupa employees and family members. Mental health support includes phone or face-to-face therapy. For information on Healthy Minds please visit the [Mental Health Hub](#) or to access their services call 0345 600 2007 (the phone service is available 24 hours a day, seven days a week).

11. External disclosure

- 11.1. The aim of this policy is to provide a way of reporting, investigating and responding to any wrongdoing or danger at Bupa internally. In most cases you should not find it necessary to speak to someone outside Bupa.
- 11.2. The law or a professional body may say that in some circumstances it may be appropriate for you to report your concerns to a body outside Bupa such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone outside Bupa. You can take advice from Protect, an independent charity which provides free, confidential legal advice on raising concerns at work. You can contact Protect by:
 - Phoning: +44(0)20 3117 2520 (* option 1)
 - Emailing: whistle@protect-advice.org.uk

Information is also available on the Protect website, the address for which is <https://protect-advice.org.uk>.

- 11.1. Parts of Bupa Group Functions are regulated by the Financial Conduct Authority (FCA) and Prudential Regulation Authority (PRA). If you work in Group Functions, you can report a concern to either the FCA or PRA by:

FCA

- Phoning: +44(0)20 7066 9200 during office hours or leave a message
- Emailing: whistle@fca.org.uk
- Writing to: Intelligence Department (Ref PIDA), Financial Conduct Authority, 12 Endeavour Square, London, E20 1JN

PRA

- Phoning: +44(0)203 461 8703 during office hours or leave a message
- Emailing: whistleblowing@bankofengland.co.uk
- Writing to: Confidential reporting (whistleblowing) IAWB team, Legal Directorate, Bank of England, Threadneedle Street, London, EC2R 8AH

You do not need to have raised your concern internally before you contact either the FCA or PRA and you do not have to tell Bupa that you have raised a concern with the FCA or PRA. You can also raise a concern with both Bupa and the FCA and/or PRA at the same time.

12. Record keeping

Adequate and relevant records will be kept in accordance with our records retention policies and procedures. These may include but will not be limited to investigatory notes, witness statements, minutes of meetings, mails, notes of telephone calls and copies of correspondence. These records will be kept in an organised and confidential manner.

13. Data protection

We are committed to handling the personal information of our people in the right way and as such all such information and records will be held in accordance with the relevant Data Protection laws and regulations. For further information please read the Employee Privacy Notice which can be found on the Speak Up website www.bupa.com/speakup

14. Review

This policy will be reviewed annually by the Speak Up Officer or more often if required.

Last reviewed: February 2020