

## Whistleblowing Policy

08 July 2025

Policy effective from	<b>15 July 2025</b>
Owner	People Director
Approved by	Board
Policy applies to	All employees and workers of Frontier (including but not limited to Associates, temporary staff and Interns)
For general queries related to this policy, please contact	People Team

## Introduction

Most issues at work can be easily resolved using our existing internal feedback mechanisms or by reaching out to those you work with closely. However, there are times when an issue is more serious, such as concerns about fraud, a mental or physical danger to staff, or malpractice.

In these instances you may be worried about raising such a concern or may not be clear about how to raise it in a way that feels comfortable.

We have updated this policy to confirm that it is safe and acceptable to speak up and to give you all the information you need to enable you to do so at an early stage and in the right way. For the avoidance of doubt, if you feel the issue is legitimate we would much prefer you to raise the matter as soon as you have a concern rather than wait for proof.

This policy applies to all those who work for us; whether full-time or part-time, employed through an agency, Associates, or as a volunteer. If you have a whistleblowing concern, please let us know.

This Whistleblowing Policy is primarily for concerns where the public interest is at risk, which includes a risk to the wider public, customers, staff or the organisation itself (e.g. where someone's health or safety is in danger, concern of environmental damage, corporate criminal offence being committed, failure to comply with a legal obligation, but also deliberate concealment of information relating to any wrongdoing). Issues that relate to your personal

employment or treatment should still be raised but will be most likely be managed via our grievance policy which can be found accompanying your employment contract.

## Our assurances to you

### Your safety

Whistleblowing is covered by Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998). It protects employees from detrimental treatment as a result of making a protected disclosure.

The Board and ExCo are committed to this policy. Provided you are raising a genuine concern, it does not matter if you are mistaken. Of course, we do not extend this assurance to someone who maliciously raises a matter they know is untrue.

If you raise a genuine concern under this policy, you will not be at risk of losing your job or suffering any form of reprisal as a result. We will not tolerate the harassment or victimisation of anyone raising a genuine concern and we consider it a disciplinary matter to victimise anyone who has raised a genuine concern.

### Your confidence

With these assurances, we hope you will raise your concern openly. However, we recognise that there may be circumstances when you would prefer to speak to someone confidentially first. If this is the case, please say so at the outset. If you ask us not to disclose your identity, we will not do so without your consent unless required by law. You should understand that there may be times when we are unable to resolve a concern without revealing your identity, for example where your personal evidence is essential. In such cases, we will discuss with you whether and how the matter can best proceed.

You can opt to raise your concerns anonymously if you would prefer to do so; you may choose to email from an external mail box or to deliver a physical letter to us. Do bear in mind that your anonymity may make it more difficult for us to investigate the matter and we would not be able to directly protect your position or to give you feedback. However, we will still commit to review the matter in the same depth.

If you are unsure about raising a concern you can get independent advice from Protect (see contact details under Independent Advice).

## How to raise a concern internally

Please remember that you do not need to have firm evidence of an issue before raising it. However, we do ask that you explain as fully as you can the information or circumstances that gave rise to your concern and where possible provide detailed examples.

### Step one

We hope you will feel able to raise it first with your **manager, mentor or project lead**. This may be done verbally or in writing. They will then agree next steps with you.

### Step two

If you feel unable to raise the matter with your manager, mentor or project lead for whatever reason, please raise the matter to the People Director.

If you want to raise the matter without your name being disclosed at any stage, please say so at the outset so that appropriate arrangements can be made.

### Step three

If these channels have been followed and you still have concerns, or if you feel that the matter is so serious that you cannot discuss it with any of the above, please contact one of the MDs.

## How we will handle the matter

We will acknowledge receipt of your concern within 5 working days. We will assess it and consider what action may be appropriate. This may involve an informal review, an internal inquiry or a more formal investigation. We will tell you who will be handling the matter, how you can contact them, and what further assistance we may need from you. If you ask, we will write to you summarising your concern and setting out how we propose to handle it and provide a timetable for feedback. If we have misunderstood the concern or there is any information missing please let us know.

When you raise the concern, it will be helpful to know how you think the matter might best be resolved. If you have any personal interest in the matter, we ask that you tell us at the outset. If we think your concern falls more properly within our grievance, bullying and harassment or other relevant procedure, we will let you know.

Whenever possible, we will give you feedback on the outcome of any investigation. Please note, however, that we may not be able to tell you about the precise actions we take where this would infringe a duty of confidence we owe to another person.

While we cannot guarantee that we will respond to all matters in the way that you might wish, we will strive to handle the matter fairly and properly. By using this policy, you will help us to achieve this.

If at any stage you experience reprisal, harassment or victimisation for raising a genuine concern please contact the **People Director or any of our Board members**.

## Your responsibility

As someone who works for us, you have a responsibility to familiarise yourself with the whistleblowing policy and procedures. We hope our assurances give you the confidence to report any suspected wrongdoing promptly. We ask you to keep confidentiality of the reports and identities involved, and cooperate with us on investigations. We aim to promote a culture of transparency and ensure no retaliation occurs against whistleblowers, and ask you to do the same.

## Independent advice

If you are unsure whether to use this policy or you want confidential advice at any stage, you may contact the independent charity Protect on **020 3117 2520** or by completing an online form found at <https://protect-advice.org.uk/contact-protect-advice-line/>. Their Advisers can talk you through your options and help you raise a concern about malpractice at work.

## External contacts

While we hope this policy gives you the reassurance you need to raise your concern internally with us, we recognise that there may be circumstances where you can properly report a concern to an outside body. In fact, we would rather you raised a matter with the appropriate regulator – such as ***HM Revenue & Customs; the Financial Conduct Authority; the Competition and Markets Authority; the Health and Safety Executive; the Environment Agency; and the Serious Fraud Office*** - than not at all.

The independent advisor at Protect will be able to advise you on such an option if you wish.

## Monitoring and Communication

The Board is responsible for this policy and will review it annually. This policy can be found on the Hub under Policies – Organisational Policies. The People Team will monitor the daily operation of the policy and if you have any comments or questions, please do not hesitate to let one of their team know. Upon commencement of employment, all new starters are required

to complete training within two weeks of commencement as part of their induction. We also provide mandatory training on this policy which will be repeated on a regular cycle.

## Data protection

We will keep a confidential record of your concern in line with our data protection protocols and in accordance with relevant data protection legislation.

## Annex A – Review schedule

Review by date	Reviewer	Date Reviewed	Date Approved	Notes
30 April 2025	Mel Moser	3 March 2025		Included cover sheet and review schedule Updated to match new governance structure
30 April 2026				
30 April 2027				