



# **Whistleblowing**

**August 2008**

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## Introduction

We all have, at one time or another, concerns about what is happening at work. Usually these concerns are easily resolved. However, when the concern isn't about your own position but is about a risk to colleagues, clients or the Company, it can be difficult to know what to do. Examples include:

- Financial malpractice or impropriety or fraud;
- Failure to comply with a legal, compliance or regulatory obligation (including breach of broadcasting or advertising codes);
- Dangers to health and safety or the environment;
- Criminal activity;
- Breach of the Company's Code of Conduct;
- Attempts to conceal any of the above

You may feel worried about raising such an issue and decide to keep your concern to yourself, perhaps feeling that it is none of your business or that it's only a suspicion. Or you may feel that raising the matter would be disloyal to colleagues, managers or the Company itself. Perhaps you have tried to raise the matter, but found out you have spoken to the wrong person or raised the issue in the wrong way and are not sure whether to take it further.

The Board and management of the Company would prefer that you raise such an issue at an early stage when it is just a concern, rather than wait for proof or let it become a complaint. This policy has been introduced to help you raise any concern about malpractice in the right way. It explains the routes open to everyone who works for the Company, including employees, temporary workers, agency staff and people working for sub-contractors.

If something is troubling you that you think the Company should know about or look into, please use this policy. If however, you want to bring a complaint or grievance that is about your personal position, please use the Harassment or Grievance Procedure - which you can get from the Watercooler or your HR Director. The Whistleblowing process is primarily for concerns where the interests of others, or of the Company, are at risk.

**If in doubt – raise it!**

## Our Assurances

### Your safety

The Company assures you that it will not take or tolerate any reprisal against any member of staff who raises a genuine concern under this policy. Provided that you are acting in good faith it will not matter if your concern proves to be mistaken. Of course the Company does not extend this assurance to someone who maliciously raises a matter they know to be untrue.

### Your confidence

With these assurances the Company hopes you will raise any genuine concern openly. However, we recognise that there may be some circumstances when you would prefer to speak to someone in confidence. 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 the Company is 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 best to proceed.

This process is not suitable for concerns raised anonymously (i.e. when someone does not give their name). This is because we are unable to protect that person from reprisal or give them any feedback and also because anonymity makes it much more difficult to investigate the concern raised. Accordingly,

whilst the Company will consider anonymous reports, this policy does not apply to concerns raised anonymously.

## How ITV will handle the matter

Once you have told the Company of your concern, we will assess it and consider what action may be appropriate. This may involve an informal review, an internal enquiry or a more formal investigation. We will tell you who will be handling the matter, how you can contact them, and what further assistance may be needed from you. If you ask, we will write to you summarising your concern and setting out how the Company proposes to handle it.

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 do ask that you tell us at the outset. If we think your concern falls more properly within the Harassment or Grievance procedure, we will tell you.

Whenever possible, the Company will give you feedback on the outcome of any investigation. Please note, however, that we will not be able to tell you about disciplinary, or other action, when it would infringe a duty of confidence the Company owes to another person.

Whilst the Company cannot guarantee that it will respond to all matters in the way that every employee might wish, it will try to handle any such concern fairly and properly.

## How to raise a concern

Please remember that you do not need to have firm evidence of malpractice before raising a concern. If you are unsure whether or how to raise a concern or you want confidential advice, you can contact the independent charity Public Concern at Work on **0800 008 6120** or by e-mail at [advice26@pcaw.co.uk](mailto:advice26@pcaw.co.uk).

We would encourage you when raising a concern to follow the steps below in the first instance either through line management or direct to head office staff as described.

### To raise a concern:

#### Step One

If you feel able to raise your concern openly with your line manager this is the best course. This may be done orally or in writing.

#### Step Two

If you feel unable to raise the matter with your line manager or you think he or she has not properly addressed the concern at Step One, please raise it with a senior manager or with your HR contact.

#### Step Three

If you have followed the above steps but you think the malpractice is continuing, or if you feel that the matter is so serious that it cannot be dealt with through either of these steps, then please raise it with either the Deputy Company Secretary or the Director of Internal Audit.

If you want to raise the matter in confidence, please say so at the outset so that appropriate arrangements can be made.

## External Advice

If you are unsure whether or how to raise a concern or you want confidential advice, you can contact the independent charity Public Concern at Work on **0800 008 6120** or by e-mail at [advice26@pcaw.co.uk](mailto:advice26@pcaw.co.uk).

Public Concern at Work have agreed to provide this service for ITV and will know how best to advise anyone contacting them.

You may also seek advice from your union, if you are a member, or should you prefer from your own lawyer.

The Company is committed to good governance and, as one of the UK's leading media groups, it fully endorses the principle of accountability. If a concern about malpractice cannot be resolved within the Company, there are circumstances where external disclosure (whether to a regulator or more widely) is both lawful and appropriate. Advice on these circumstances is available from Public Concern at Work.

## **Further Information**

### **Public Concern at Work**

[www.pcaw.co.uk](http://www.pcaw.co.uk)

### **DTI – Public Interest Disclosure Act**

[www.dti.gov.uk/er/individual/pidguide-pl502.htm](http://www.dti.gov.uk/er/individual/pidguide-pl502.htm)

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