

SpeakUp Standard



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1 What is SpeakUp

A SpeakUp (or whistleblowing) is where someone reports **suspected** or known past, present or future misconduct. Misconduct includes:

- Breaches of our [Code of Conduct](#)
- A criminal offence, failure to comply with a legal obligation or miscarriage of justice.
- Improper conduct or unethical behaviour or behaviours which are not in accordance with our Values.
- Dangers to health, safety or the environment.
- The deliberate concealment of information about any of the above.
- Retaliation against those raising concerns.

If you have an employment related question or grievance, it may be more appropriate to use the grievance procedure set out in our [Employee Handbook](#). If you are unsure whether your concern is a Grievance or SpeakUp related matter, guidance can be provided by Group Business Integrity or ER Hub.

Examples of SpeakUp and Grievance scenarios are set out in the table below:

SpeakUp	Grievance
You overhear conversations about a colleague processing payment to businesses that do not exist and falsifying records to hide what has happened.	You are concerned that you have not received a pay rise when you are a top performing employee, with others in the team indicating they have.
There are indications that performance data has been hidden by colleagues from a client.	You applied for a promotion, and believe you were the best candidate, with the role being offered to a colleague who is a friend of the hiring manager.
You witness a senior colleague discriminate against a number of colleagues due to their race.	

2 What is the purpose of this Standard?

A core value at Capita is openness. Speaking Up (or whistleblowing) is where an employee, worker or third-party reports suspected past, present, or future misconduct. This includes breaches of the [Code of Conduct](#) and Capita's [Values and Behaviours](#), or an attempt to conceal breaches of the Code of Conduct. Capita takes breaches of the Code of Conduct extremely seriously.

This Standard explains:

- How to report a concern,
- What will happen when a SpeakUp concern is raised,
- Who will be involved in the investigation,
- Communication with those who report cases to SpeakUp ("**Reporters**").

3 Who does it apply to?

SpeakUp is important in supporting Capita's values and helps to maintain a healthy working culture. Reporting concerns enables Capita to investigate your concerns in the correct manner, and take action, ensuring that we demonstrate Capita's values and behaviours.

This Standard applies to all Capita.

4 Who Manages SpeakUp in Capita

Capita's Group Business Integrity Team (BIT) manages SpeakUp. BIT is an independent team within Capita. It reports into Capita's Group Internal Audit & Risk Director who reports to the Chair of the Group Audit & Risk Committee, a member of Capita's Board.

BIT manage all SpeakUp investigations across Capita. The team is made up of trained investigators, with skills and experience in managing Code of Conduct investigations. Investigators hold professional qualifications and have worked on SpeakUp investigations during their professional career.

5 SpeakUp Approach

5.1 Identifying a SpeakUp Concern

If you face a situation where you have a concern, **you must report it** via this SpeakUp process.

5.2 Reporting a SpeakUp Concern

SpeakUp concerns can be reported by any of the following methods:

- Through Whispli, which is a secure and anonymous two-way communication platform. For more information about Whispli please see [How It Works – Whispli](#). Whispli can be accessed at <https://capita.whispli.com/speakup>. This platform can be accessed anywhere in the world and does not require a Capita device to access. You can also access Whispli via the Whispli Hotline (Local telephone numbers are shown in [Appendix 1](#)).
- Contacting a manager or HR.
- Speaking with a member of Group Business Integrity Team.

Reports via Whispli can be made anonymously or not. Where a reporter identifies themselves when raising a SpeakUp concern, this information will be protected, and only those with a genuine need to know will have access to this information.

In certain circumstances it may not be possible to progress specific aspects of an investigation without this information.

We use a platform provided by Whispli, an award-winning provider of tools to help whistleblowers and informants make reports. The Whispli platform protects your identity through:

- Making the entire process completely anonymous for you, the informant.

- No potential identifying information (like IP address, personal information, language, etc.) being passed through to Whispli or Capita.
- Robust information and data security so that your identity is safe.
- You, as the informant, are in control of what you share and submit.

Whispli was developed by a whistleblower who uncovered a \$20 million fraud at his company. For more information about the Whispli platform, visit www.whispli.com.

5.3 Initial Steps

Capita's Group Business Integrity team will log the report and contact the Reporter to:

- confirm that the report has been received, within 72 hours of receipt,
- ask questions on the allegations, ensuring that all relevant information is obtained in order to progress an investigation.

If the concern relates to a member of the Group Business Integrity Team, the report will not be seen by the team, and will instead be sent to Capita's Chief General Counsel to determine the approach to the investigation.

If a report has been raised through Whispli, the Reporter and the Investigator can continue to use the platform to communicate with each other securely. This includes the ability to live chat with the Investigator.

Where a report is considered to be a Grievance by BIT, this will be referred to Capita's ER Hub, with the SpeakUp report closed. The Business Integrity Team will contact the reporter prior to passing the report to the ER Hub.

The report will be passed to the ER Hub within 48 hours of identification as a Grievance and communication with the reporter confirming the intended action to transfer to the ER Hub.

5.4 Investigator Assigned

Each case is assigned a skilled and experienced investigator from the Business Integrity Team. This investigator will lead the investigation.

Some cases may require the expertise of a subject matter expert to support and advise on some of the issues in the case, to ensure it is dealt with appropriately. If that is the case, the investigator will contact the functional leads for the subject matter areas to request support for the investigation.

Subject matter experts for each area of the Code of Conduct are identified in the table below:

Code of Conduct Area	Functional Subject Matter Expert
Wellbeing & Health	Team Health
Engagement & Inclusion	HR/ER Hub
Anti-racism, discrimination, harassment, and bullying	HR/ER Hub
Drugs	HR/ER Hub
Health, Safety, Environment & Safeguarding	Health & Safety
Conflicts of Interest	Group Legal / Secretariat
Responsible Business	Responsible Business Committee Chair

Supply Chain	Group Procurement
Business Travel & Expenses	Business Integrity
Bribery & Corruption	Business Integrity / Group Financial Crime Prevention
Gifts & Entertainment	Business Integrity / Group Financial Crime Prevention
Political Donations	Business Integrity
Anti-money laundering, terrorist financing, sanctions, fraud, and facilitation of tax evasion	Business Integrity
Fair Competition	Group Legal
Regulatory Investigation	Group Legal / Secretariat
Insider Dealing	Group Legal / Secretariat
Contracts, Expenditure & Delegation of Authority	Group Legal
Brand (Reputation)	Group Comms
Intellectual Property & Confidential Information	Group Legal & Information Security
Communications	Group Comms
Information Security	Information Security
Privacy	Privacy

The reporter will be informed if a subject matter expert is involved to support the investigation.

In cases which involve the actions of current employee, a member of the ER Hub will also support the investigation.

The reporter will be contacted to confirm who is leading the investigation, and the approximate timeline of the investigation.

5.5 Investigation

All investigations will be completed in line with the Investigation Framework.

The role of the investigator is to be independent, fair, and objective so that they can establish the facts of the matter and reach a conclusion on what did or did not happen. An investigator should do this by identifying and collecting evidence of what has happened and keep accurate records of all actions taken and data gathered.

Investigators will be familiar with all relevant Capita policies, standards, and guidance.

The key stages of the investigation are outlined in the table below:

Phase	Activity
Phase 1: Contacting Reporter	Reporter contacted to ask questions on the allegations, ensuring that all relevant information is obtained in order to progress an investigation.
Phase 2: Collecting Evidence	Collecting documents and records to understand the incident under investigation.
Phase 3: Interviews	Conducting fact find interviews with relevant individuals to understand the evidence that has been collected and provide context for any actions taken.

Phase 4: Reporting	Once the incident has been investigated, a report will be produced, summarising the investigation and documenting conclusions.
Phase 5: Remedial Action	<p>If required, this may include:</p> <ul style="list-style-type: none"> • Rectification of control weaknesses • Disciplinary action • Engagement with law enforcement agencies such as the police or regulatory bodies • Civil and / or criminal legal proceedings.

5.6 Completion timescales

An investigation varies in length. The Reporter will be kept informed of the progress. The average length of an investigation, from being raised to completion is between two and three months. A complex investigation can take longer to complete. Where it is complex, the Reporter will be informed.

During the course of the investigation, the reporter may contact the Investigator at any point, and the Investigator will keep the Reporter updated with contact at regular intervals. There may be instances where the Investigator is unable to provide specific information due to the nature of the investigation.

5.7 Confirmation of Outcome to Reporter

The outcome of the investigation will be communicated to the Reporter. This may not include all aspects of the investigation and will take into consideration confidentiality and privacy of information and individuals involved in the process.

5.8 Post Investigation Contact

Capita wants to support Reporters. A Reporter can contact the Group Business Integrity team at any point where they have any concerns that they are being treated unfairly or differently as a result of reporting a concern.

The SpeakUp policy states that no action will be taken against you if you raise a genuine concern, whether proven or not.

6 Concerns

If the Reporter has concerns about how a SpeakUp investigation is being handled, those concerns should be reported to the [Head of BIT](#), or alternatively to [Capita's Chief General Counsel](#).

7 Confidentiality

Access to Capita's SpeakUp data is restricted to those who have a genuine need to know, with each case restricted to those working on the investigation.

The individuals that **may** have access to the Reporter details include the Investigator, any Subject Matter Expert, Head of BIT, Chief General Counsel, and the ER Hub.

Where an allegation is in relation to one of these parties, they will not be able to see any information on the SpeakUp report, or investigation.

There may be circumstances where the identity of the reporter may need to be shared in order to support the investigation. The investigator will only share the identity of the reporter following consent being obtained from the reporter, or if required by law. The identity of the reporter is protected. Caution will also be taken in sharing details that may identify the reporter without their name being shared.

8 Manager Expectations

If someone raises a SpeakUp concern with you, you should contact the Group Business Integrity team, through SpeakUp@capita.com or through the contact numbers available at <https://capita.whispli.com>.

9 Non-Compliance

Failure to adhere to this standard may result in disciplinary action.

10 Can this Standard be shared with a third party?

This Standard is a public document.

11 Further Information

Further information can be found in the following documents. The Group Business Integrity SharePoint site also holds information in relation to SpeakUp Investigations.

11.1.1 *Investigation Framework*

11.1.2 [Code of Conduct](#)

11.1.3 [Capita Values and Behaviours](#)

11.1.4 [SpeakUp Policy](#)

11.1.5 *SpeakUp FAQs*

12 Appendices

12.1 Appendix 1 – SpeakUp Telephone Numbers

Our SpeakUp helpline telephone numbers, available 24 / 7 are:

Country	Telephone Number
United Kingdom	+ 44156 433 4769
Poland	+48 729 086 954
Germany	+49 30 83796862
Ireland	+35 312 338 780
Switzerland	+41 43 505 28 41

12.2 Appendix 2 – SpeakUp Online Portal

Our confidential, independently operated, SpeakUp website is available to report concerns. The website can be accessed <https://capita.whispli.com/speakup> (or use the QR Code to access the site)



12.3 Appendix 3 – Prescribed Bodies for Reporting

12.3.1 United Kingdom

- Further guidance and a list of UK prescribed persons / bodies is available from www.gov.uk/whistleblowing
- If you work in our financial services regulated businesses and are a UK based colleague, the Financial Conduct Authority (FCA) or the Prudential Regulation Authority (PRA) which regulate some of Capita's businesses are the prescribed bodies for these firms.
 - 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 us that you have raised a concern with them. You can also raise a concern with both Capita and the FCA and/or PRA at the same time. **Only UK based employees may report to the FCA/PRA.**
- **FCA** – whistle@fca.org.uk
+44 (0)20 7066 9200
Intelligence Department (Ref PIDA),

Financial Conduct Authority,
12 Endeavour Square, London, E20 1JN

- **PRA** – whistleblowing@bankofengland.co.uk
+44 (0)203 461 8703
Confidential reporting (whistleblowing),
PRA, 20 Moorgate, London EC2R 6DA.



Speak Up



When you see something wrong, we need to know. Use our confidential SpeakUp process to raise your concerns, so we can deal with it.

Scan the QR code to find out more.

