

Integrated Management System	FP01	
Speaking Up & Whistleblowing Policy		
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1. Introduction

Speaking Up is a vital way that employees and Trustees of the charity and its subsidiaries can play their part in mitigating the risk of incidents of many kinds – including in relation to safeguarding, fraud, bribery, corruption and other dishonest conduct.

Further, UK law provides specific protection for employees who raise legitimate concerns about specified matters ('whistleblowers'). These are called "qualifying disclosures". A qualifying disclosure is one made in the public interest, or preserving the charitable focus of the organisation, by an employee who has a reasonable belief that one or more of the following is, or has been, or is likely to be committed:

- a criminal offence;
- a miscarriage of justice;
- an act creating risk to health and safety;
- an act causing damage to the environment;
- a breach of any other legal obligation;
- concealment of any of the above;

It is not necessary for the employee to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. The employee has no responsibility for investigating the matter, it is the organisation's responsibility to ensure that an investigation takes place.

An employee who makes such a legitimate protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimised, because they have made a disclosure.

The legislation protecting individuals who make a protected disclosure applies not only to employees, but also to any person who undertakes to do or perform personally (or otherwise) any work or service for the employer, regardless of the nature of the contractual relationship between them.

WRAP encourages employees to raise their concerns under this procedure in the first instance. If an employee is not sure whether to raise a concern, they should discuss the issue with their line manager or a member of the HR team.

Employees are advised to 'speak up' – that is – to have confidence in raising an issue or concern and confidence that it will be dealt with appropriately.

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2. Aim of policy

This policy applies to all employees of WRAP, including its subsidiaries. Other individuals performing functions in relation to WRAP, such as agency workers and contractors, are encouraged to use it.

It is important to WRAP that any fraud, misconduct or wrongdoing by employees of the organisation is reported and properly dealt with. WRAP therefore encourages all individuals to raise any concerns that they may have about the conduct of others in the organisation or the way in which the organisation is run.

This policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with. There are various routes to speak up / blow the whistle that colleagues can take, as described below.

3. Protection and support for whistleblowers

Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the employee who raised the issue.

An employee who makes such a protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimised, because they have made such a disclosure.

This means that the continued employment and opportunities for future promotion or training of the employee will not be prejudiced because they have raised a legitimate concern. If an employee believes that they have suffered any such treatment, they should inform the CFOO immediately. If the matter is not remedied, the employee should raise it formally using the Grievance Procedure.

Victimisation of an employee for raising a qualified disclosure will be a disciplinary offence and could result in disciplinary action in accordance with the organisation's disciplinary procedure.

"Protect" is a whistleblowing charity who provide confidential advice for individuals who have witnessed wrongdoing in their workplace but are unsure how to raise their concerns. They operate a confidential helpline (020 3117 2520) and advice can be found on their website: www.protect-advice.org.uk

This policy is written in line with guidance from the UK Charity Commission, further information about whistleblowing and advice can be found on their website:

www.gov.uk/government/organisations/charity-commission

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4. Principles

If misconduct is discovered as a result of any investigation under this procedure the organisation's disciplinary procedure will be used, in addition to any appropriate external measures.

If an allegation is made maliciously, for personal gain or is deemed to be vexatious, appropriate action, that could include disciplinary action, may be taken.

An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager or director, employees should not agree to remain silent. They should report the matter to a member of the HR team.

This procedure is for disclosures about matters other than a breach of an employee's own contract of employment. If an employee is concerned that their own contract has been, or is likely to be, broken, they should use the organisation's Grievance procedure.

5. Making a claim anonymously or confidentially

If an employee reports a disclosure to WRAP, the need for confidentiality will be respected although any concern raised under this procedure will need to be properly documented.

WRAP believes that all employees should feel able to put their name to the allegations which they raise, as concerns expressed anonymously are more difficult to investigate. If employees raise a concern anonymously, depending upon the exact circumstances, it may nonetheless be possible for their identity to be deduced. If, contrary to this policy, they then suffer reprisals, it may be difficult to show that this was as a result of them raising a concern, i.e. it may not be possible to protect unidentified people.

If an employee reports their concern to the media, in most cases the employee will lose their whistleblowing law rights.

6. Procedure

In the first instance many concerns can be raised with an employee's line manager, head of team, Director, or the HR team. Most concerns can be addressed via this route and dealt with accordingly. However, if you feel like this route is not appropriate, or the

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response you have been given is not satisfactory, the whistleblowing route below should be used. As described above, you should not fear reprisals or suffering other detriments for making disclosures in good faith.

Stage 1. You should make a disclosure to the CFOO. If the disclosure relates to the CFOO, then the disclosure should be made to the CEO. If the disclosure implicates the CEO, the disclosure should be made to the Chair of the Audit and Risk Committee (contact details at the end of the policy). The individual to whom the disclosure is made is designated as the 'Investigation Sponsor'.

Stage 2. The Investigation Sponsor will arrange an investigation into the matter (either by investigating the matter personally or immediately passing the issue to an independent person with the appropriate technical expertise to carry out an investigation). The investigation may involve the employee and other individuals involved giving a written statement. Any investigation will be carried out in accordance with the principles set out above. The employee's statement will be considered, and they will be asked to comment on any additional evidence obtained.

The outcome of the investigation, including a recommendation as to whether the matter requires reporting to the appropriate government department or regulatory agency (see further details below), will be submitted to the CEO. All whistleblowing disclosures will also be reported to the Global Audit and Risk Committee for information. If the whistleblowing disclosure concerns the CEO then the report will go to the Global Audit and Risk Committee only.

If disciplinary action is required, the Investigation Sponsor will report the matter to the HR team and start the disciplinary procedure. On conclusion of any investigation, the employee will be told the outcome of the investigation and the recommended course of action. If no action is to be taken, the reason for this will be explained.

Stage 3. If the employee is concerned that WRAP has failed to make a proper investigation, they should inform the Investigation Sponsor who will arrange for another manager to review the investigation carried out, make any necessary enquiries and make their own report to the CEO and the Global Audit and Risk Committee as in stage 2 above. Any approach will be treated with the strictest confidence and the employee's identity will not be disclosed without their prior consent.

Stage 4. If on conclusion of stages 1, 2 and 3 the employee reasonably believes that the appropriate action has not been taken, they can report the matter to the

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proper authority. UK legislation sets out a number of bodies to which qualifying disclosures may be made. These include:

- The Charity Commission;
- HM Revenue & Customs;
- the Financial Conduct Authority;
- the Competition and Markets Authority;
- the Health and Safety Executive;
- the Environment Agency;
- the Serious Fraud Office.

Equivalent authorities exist in other countries in which WRAP operates.

7. Data Protection

When an individual makes a disclosure, WRAP will process any personal data collected in accordance with its data protection policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

The General Data Protection Regulation (GDPR) requires employers to comply with principles for processing personal data, including protecting against unauthorised access of personal data. Personal data that is inappropriately accessed or disclosed may constitute a data breach. The GDPR requires organisations to keep a record of all data breaches and, where the breach is likely to result in a risk to the rights and freedoms of individuals, the organisation must notify the Information Commissioner within 72 hours of becoming aware of the breach. If the data breach results in a high risk to the rights and freedoms of individuals, those individuals must be notified without undue delay.

8. Other important information

Section 43J of the UK Employment Rights Act 1996 provides that a settlement agreement made between an employee and an employer cannot prevent future protected disclosures.

Any confidentiality obligations in contracts of employment that would prevent an employee making a protected disclosure will be void.

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9. Summary

- Speaking up about matters of concerns – including in relation to safeguarding, bribery, fraud, corruption, and other unethical behaviour is a key tool in the organisation's approach to managing the risks;
- Employees should feel confident to raise issues informally if they feel able to;
- employees have a right to make a protected disclosure if there is a legitimate reason to do so;
- employees should also report 'low level concerns', concerning behaviours by professionals working with children and adults at risk which may not initially present as harmful and illegal. An example would be the language someone uses or observed behaviours which cause other employees to feel uncomfortable or concerned¹;
- employees are protected under whistleblowing procedures;
- disclosures should be raised with the appropriate individual as outlined above;
- the need for confidentiality will be respected;
- all disclosures will be investigated following an agreed process;
- the outcome of the investigation, including the recommended course of action, will be reported to the CEO, the Global Audit and Risk Committee and to the whistleblower; and
- if the whistleblower is not happy with the outcome of the investigation, they can report the matter to the proper authority.

10. Audit Committee Chair contact details

Name: Vijay Doshi

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¹ Additional bullet point approved by WRAP CFOO