

Speak up Policy



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1.1 Purpose

- i. At Pets at Home, our culture and values mean that we are committed to having high standards of professionalism and integrity throughout our business. This means that it is really important that when anything is being done that isn't in line with our culture, values or processes, it is reported and properly dealt with.
- ii. We would want any concern to be raised to your line managers or one of our specialists (such as Field Pet Partners or People Partners) but we do understand though that it can sometimes be difficult to let us know when things aren't going as well as they should and so we have created our Speak Up policy to help you understand what you should do in these cases.
- iii. Any concerns that are raised as part of our Speak Up policy will be taken seriously and dealt with appropriately. This means that with this policy we aim to:
 - a. encourage colleagues to report any genuine concerns about wrongdoing at work (more detail on this is in point 1.4) as soon as possible;
 - b. provide guidance on how to report any wrongdoing and how such concerns will be dealt with;
 - c. demonstrate that we are serious about addressing any genuine concerns about wrongdoing and that we will support anyone who raises such concerns in line with this policy; and
 - d. make it clear that we will not tolerate the victimisation of anyone who raises genuine concerns about wrongdoing in line with this policy, even if it turns out that those concerns are misplaced.
- iv. This policy only applies to concerns that have a public interest aspect to them. It does <u>not</u> cover individual grievances or complaints about employment, for example if you believe you are being bullied or discriminated against or that the terms of your contract have been breached. If you have concerns like this, you should raise them under our grievance policy or by contacting the People Team (contact details below). If you are unsure about which procedure to use, you should speak to one of the Nominated Colleagues, whose contact details are below.



v. This policy is non-contractual which means that it does not give any legal rights to individuals. We may change all or any part of this policy in any way at any time and while it sets out our likely response to disclosures, it does not commit us to them.

1.2 Who does the policy apply to?

This policy applies to anyone who works in the business or for us, including:

- a. colleagues;
- b. Practice Owners, SVPs and locums;
- c. workers, including agency workers;
- d. contractors;
- e. non-executive directors;
- f. consultants; and
- g. volunteers.

1.3 What types of concern should be raised under this policy?

- i. If you have genuine concerns that any of the following activities are taking place at work (or have taken or are likely to take place) and have a public interest element in them (so it's for the greater good), you should raise them under this policy. This includes things like:
 - a. criminal activity;
 - b. breach of any legal obligation;
 - c. danger to health and safety;
 - d. danger to animal welfare or breach of professional conduct;
 - e. damage to the environment;
 - f. miscarriages of justice;
 - g. bribery; or



- h. the deliberate concealment of any of the above.
- ii. If you are unsure about whether any suspected wrongdoing is covered by this policy you should submit a **Speak Up Report** via our confidential online platform, or call the **Speak Up Helpline** or one of the Nominated Colleagues, whose contact details are at the end of this policy.

1.4 How to raise a concern

- i. You should normally raise any concerns about wrongdoing at work with your line manager but if you don't feel comfortable doing this or if you have already done this and you don't feel that your concerns have been dealt with, you should submit a **Speak Up Report** via our confidential online platform, or call the confidential **Speak Up Helpline** on **0808 168 3620** or alternatively contact one of the Nominated Colleagues whose contact details are set out at the end of this policy.
- ii. If your concerns are specifically about pet welfare, then you can also submit a **Pet Promise Report** via our confidential online platform, or call our confidential **Pet Promise Line** on **0808 168 3622**. All calls are confidential and are dealt with by our Veterinary Services team.
- iii. Where concerns are raised via the a Speak Up Report, via the Speak Up Helpline or with a Nominated Colleague, a confidential interview will be arranged with you to discuss the areas of concern. At this stage you will be asked whether you are prepared for your identity to be disclosed as this may affect the extent of the investigation that may be carried out and so possibly the actions which can be taken. A brief summary of the interview will be taken and a copy of this will be given to you.
- iv. You may bring a work colleague or representative to any meetings under this policy, provided they agree to respect the confidentiality of the matter.
- v. Depending on the nature of the concerns raised, we may appoint an investigator or team of investigators to investigate your concerns. We will aim to keep you reasonably informed of the progress of the investigation and the final outcome. While we will give as much feedback as we can, due to the legal obligations of confidentiality we owe to other colleagues, it will not usually be possible for us to provide feedback on the detailed outcome of any disciplinary action taken against another colleague or where our response may be



- commercially sensitive. You should treat any information about the investigation as confidential.
- vi. Raising a genuine concern will protect you against victimisation or other less favourable treatment as a result of your disclosure. However, it does not provide you with any right to any (or any minimum level of) involvement in the resulting investigation nor to dictate any action, whether or not your concern is found to be genuine.
- vii. If you are not satisfied with the outcome, after having raised a concern you may contact the People Team (contact details below).
- viii. If you raise or report a concern which you know is false you may be subject to disciplinary action, up to and including dismissal.

1.5 Professional Conduct and Animal Welfare

- If you become aware of veterinary professional misconduct or inappropriate conduct by a professional colleague at a practice which may include:
 - a. breach of the RCVS Codes of Professional Conduct, for veterinary nurses and surgeons; or
 - b. unethical behaviour for example, false certification, care of an animal which falls short of the expected standards or practicing under the influence of drugs or alcohol, you may wish to report the issue.
- ii. You should first consider resolving such issues at the practice, as set out in the RCVS guidance on whistleblowing: (http://www.rcvs.org.uk/advice-and-guidance/code-of-professional-conduct-for-veterinary-surgeons/supporting-guidance/whistle-blowing/) and discuss the matter with a Practice Owner, SVP or senior management team member there.
- iii. Alternatively, you can raise such concerns with Samantha Butler-Davies, our Veterinary Services Director. All issues relating to veterinary patient animal welfare should be directed to Samantha Butler-Davies, where appropriate.
- iv. If the matter is not resolved then you may wish to inform the RCVS, whose contact details are below.



- v. Please also be aware of the duty to keep client information confidential when reporting any issues.
- vi. If you have concerns regarding animal welfare in relation to Pets at Home instore pets, then you can also submit a **Pet Promise Report** via our confidential online platform or call our confidential **Pet Promise Line on 0808 168 3622**. All reports and concerns are confidential and are dealt with by our Veterinary Services team.

1.6 Anonymous complaints

- i. You are not encouraged to raise any concerns about wrongdoing at work anonymously, as this makes it difficult for us to investigate them. If you have any concerns about identifying yourself, you should speak to one of the Nominated Colleagues whose contact details are below or call the confidential Whistleblowing Helpline. We will accommodate any requests for anonymity as far as possible.
- ii. You can obtain free confidential advice on whether to and how to raise a concern by submitting a **Speak Up Report** or by calling the **Speak Up Helpline**, via a Nominated Colleague or the **Pet Promise Report** form or **Pet Promise Line** by contacting the independent charity, **Protect** whose details are below.

1.7 Raising concerns externally

- i. We hope that you will raise any concerns about wrongdoing at work <u>internally</u> in line with this policy, but we recognise that it may be appropriate for you to contact an external body such as a regulator where the complaint has been raised but ignored or there has been a recurrence of the same wrongdoing.
- ii. We would strongly recommend that you seek advice before raising any concerns externally. You can obtain free confidential advice on whether and how to raise a concern via the helpline run by the independent charity, **Protect** whose details are below.

1.8 Protection from victimisation

i. We will not tolerate any victimisation of individuals because they have raised a concern under this policy and we will treat any victimisation as a disciplinary matter, which may lead to dismissal. However, nothing in this policy means that someone who has raised a concern under it cannot be managed (monitored, directed,



disciplined, etc.) in the ordinary course of the employment relationship.

- ii. If you believe you are being victimised or have suffered detrimental treatment for having raised genuine concerns about wrongdoing at work in accordance with this policy, you should raise a grievance in line with our grievance procedure. You should identify the concern raised and how it was raised, and also the specifics of the treatment which you believe has resulted from your doing so.
- iii. We will take all complaints seriously and deal with them promptly. If your complaint is upheld then you will be notified of this. The details of any action taken against another colleague as a result are usually confidential.
- iv. You should be aware that if you victimise someone for having raised concerns about perceived wrongdoing, you could be held personally liable to pay compensation at an Employment Tribunal.

1.9 Responsibility for the policy

The Board has overall responsibility for this policy and the Nominated Colleagues have day-to-day responsibility for it. The policy will be reviewed when needed.

1.10 Contacts

Nominated Colleagues

Lesley Lazenby

07866 156688 Legal Director and Company Secretary companysecretary@petsathome.co.uk

Chris Burns

Group Head of Health and Safety 07436 261064 cburns@petsathome.co.uk

Samantha Butler-Davies

Director of Veterinary Services samantha.butler-davies@vets4pets.com



Additional Contact Information:

Confidential Speak Up Helpline 0808 168 3620

Speak Up Report (confidential online Speak Up Report Form

form)

Confidential Pet Promise Line: 0808 168 3622

Pet Promise Report (confidential online Pet Promise Report Form

form)

People Team 0161 486 3544

PeopleDirect@petsathome.co.uk

Protect 020 3117 2520



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