



**OUP Spain**  
**Raising Ethical Concerns Procedures**

**June 2023**

## 1 Introduction

These procedures have been documented pursuant to the EU Whistleblower Directive 2019 and the Spanish Whistleblower Law 2023.

## 2 Whistleblower Reporting Channels

Whistleblowers may report concerns, including anonymously, using the following channels of communication:

- Online: [www.SpeakUpOUP.ethicspoint.com](http://www.SpeakUpOUP.ethicspoint.com) (managed by external provider NAVEX)
- By telephone: +34 900 997 963 (managed by external provider NAVEX)
- By email: [groupcomplianceofficer@oup.com](mailto:groupcomplianceofficer@oup.com)
- By post: OXFORD UNIVERSITY PRESS ESPAÑA, S.A. - Avenida de Castilla nº 2, Parque Empresarial San Fernando, Edificio Atenas, 1º, 28830 San Fernando de Henares / Madrid / España, for the attention of Ethics & Compliance
- For a face-to-face meeting, email: [groupcomplianceofficer@oup.com](mailto:groupcomplianceofficer@oup.com)

The above channels are available to report any non-compliance with regulations or conduct inconsistent with OUP's policies, including the [Code of Conduct](#) or [Partner Code of Conduct](#).

## 3 OUP Ethics and Compliance Programme

The Ethics and Compliance Programme (Programme) at Oxford University Press (OUP) is designed to foster an organizational culture that is committed to ethical conduct and compliance with all applicable laws wherever OUP operates.

The Group Ethics and Compliance Officer (GECO) is responsible for the Programme and for leading the Ethics and Compliance function.

## 4 Policies and Resources

### 4.1 Code of Conduct

OUP's Code of Conduct sets out the principles and standards which underpin OUP's work and supports employees and other members of staff in making good decisions every day. The Code of Conduct is available in more than 15 languages, including Spanish, and is reviewed and reissued annually.

## **4.2 Raising Ethical Concerns Policy**

OUP's Ethical Policies support its Code of Conduct and set out the ethical standards that OUP follows in all its activities. Eight policies are included, one of which is the Raising Ethical Concerns Policy.

The Raising Ethical Concerns Policy outlines a number of channels for reporting concerns, including the confidential reporting channel known as Speak Up.

## **4.3 Global Dignity at Work Policy**

OUP recognizes the right of its colleagues to be treated with respect and dignity, and is committed to providing an inclusive working environment in which these rights are protected.

The Global Dignity at Work Policy is designed to ensure that OUP colleagues are treated with dignity and respect at work, and seeks to ensure that bullying, harassment, and discrimination at work do not arise.

## **4.4 Speak Up**

Speak Up is a confidential service that accepts reports of concerns by web-report, or by calling a local freephone number where available. Reports may be made anonymously. Web-reports are accepted in five languages. The telephone service is available in 21 languages, including Spanish. Whistleblowers receive an acknowledgement within 48 hours.

Speak Up reports and reports made through any other channel (e.g. directly by an OUP colleague or third party to an OUP manager, a member of Group Ethics and Compliance or Group HR, etc.) are managed by the responsible functions at OUP. These functions include: Group HR, Group Ethics and Compliance, Group Information Security and Data Privacy, Group Safety and Security, and Group Legal.

## **4.5 Navex**

OUP uses Navex, an online case management system, to record and manage its cases globally.

## **5 Raising Ethical Concerns Procedures for OUP Spain**

In addition to the Programme elements set out above, which apply globally, the following specifically applies to OUP Spain:

- OUP Spain colleagues have direct access to the Raising Ethical Concerns Policy which outlines the general principles and the procedure to manage the information received. A bilingual page on the OUP Spain OxfordShare Site is available which sets out the Raising Ethical Concerns Policy, Speak Up, and these Procedures.
- OUP Spain protects the identity of all whistleblowers and keeps information received confidential. Managers who receive information from a whistleblower are informed of their responsibilities to protect the identity of the whistleblower and keep information received confidential.
- OUP Spain employees may raise any concerns with the Independent Whistleblower Protection Authority in Spain.

When responding to and/or conducting investigations into incidents of whistleblowing in relation to OUP Spain, the following specifically applies:

- Where the whistleblower requests a face-to-face meeting, the meeting will be held within a period of seven calendar days.
- As set out above, OUP Spain makes available other channels for communication in addition to Speak Up, i.e., a postal address, e-mail address, or safe place as nominated by the whistleblower.
- Verbal communications from the whistleblower, including those made through a face-to-face meeting, by telephone, or by voice messaging system, are documented in one of the following ways, subject to the whistleblower's consent:
  - By a recording of the conversation in a secure, durable and accessible format, or,
  - Through a complete and accurate transcription of the conversation by the personnel responsible for handling the conversation.
- The whistleblower is given the opportunity to verify, rectify, and agree to the transcription of the conversation by signing an acknowledgement. Alternatively, the whistleblower is given access to their recording.
- Whistleblowers who communicate through OUP's internal channels (e.g., in-person reporting, email, etc.) are informed in a clear and accessible manner, about the available external reporting channels to the Independent Whistleblower Protection Authority in Spain and, where appropriate, to the institutions, bodies, offices, or agencies of the European Union.
- Once a whistleblower raises a concern through any channel, OUP acknowledges receipt, regardless of the channel, within a period of seven calendar days.
- Investigations are generally finalised within a maximum period of three months from the date of receipt of the concern. This may be extended to six months if the complexity of the investigation so requires.

- In all interviews, whether face-to-face or online, the whistleblower, any witness(es), and subject(s) of the alleged misconduct are provided with a document explaining how their data will be processed, in compliance with Spanish and European data privacy regulations.
- At the end of the investigation, the subject(s) are given the right to be informed of the actions or omissions attributed to them, and to respond to the findings.
- When the facts could be indicative of a crime, OUP will immediately communicate the information to the Public Prosecutor's Office in Spain and, where appropriate, to the European Public Prosecutor's Office.
- The whistleblower is protected from any punitive action against them, as set out in the EU Whistleblower Directive.
- OUP maintains respect for the presumption of innocence while conducting the investigation.

Group Ethics and Compliance, Group Legal, and Group HR will work in a coordinated manner to regularly review and update, as appropriate, the relevant policies and procedures to reflect any future legislative changes in Spain in order to ensure continuing compliance with the EU Whistleblower Directive.