

# Whistleblowing Policy

## Revision history

Version	Revisions made	Date approved	Approved by
1.4	Owner Changed	26.09.2008	Judith Shepherd
2		24 October 2011	Management Board
		24 November 2011	Audit and Risk Committee
3	Amendments in line with the Enterprise and Regulatory Reform Act 2013	22 August 2014	Management Board
		11 September 2014	Audit and Risk Committee
3.1	General update	17 November 2016	Audit and Risk Committee

## 1. Introduction

The City & Guilds Group is committed to the highest standards of conduct and integrity in its business activities in the UK and overseas. This requires honesty and integrity in all areas of the business and a culture of openness between all staff, third parties, customers and contractors.

We encourage those that have any concerns about any aspect of the work of the City & Guilds Group come forward and voice those concerns.

Therefore, the purpose of this policy is to:

- give information on how to identify situations that may represent wrongdoing (see section 3);
- provide information on how to report allegations of wrongdoing (see sections 4 and 5); and
- give reassurance to those reporting concerns of wrongdoing that they are protected from adverse consequences (see section 7).

In this policy, City & Guilds Group means:

- UK members of the City & Guilds Group which are owned or controlled directly or indirectly by The City and Guilds of London Institute; and
- overseas members of the City & Guilds Group which are owned or controlled directly or indirectly by The City and Guilds of London Institute ("**City & Guilds**").

Companies that are not wholly owned subsidiaries (as set out in the Legal Department's Group Legal Structure document) are out of scope of this policy.

## 2. Scope

This policy applies to:

- all individuals working for the City & Guilds Group at all levels and grades, including the Trustees, Chief Executive Officer, all directors, senior managers, and employees (whether permanent or fixed term) and temporary workers, wherever located; and
- consultants, contractors and suppliers.

## 3. What is Whistleblowing?

Whistleblowing is the process whereby someone can raise a concern about suspected wrongdoing or malpractice within the City & Guilds Group.

A whistleblowing concern may include any action committed by an individual, a team or by a third party in dealings with the City & Guilds Group, which you feel constitutes one of the following:

- malpractice such as:
  - actions contrary to City & Guilds Group policy;
  - actions contrary to any regulations set by a regulatory body to which City & Guilds Group are subject to;
  - financial malpractice or maladministration; or
  - failure to follow financial, procurement and contract procedure rules;
- criminal offences or other unlawful activity such as fraud or corruption including accepting or paying bribes;
- environmental damage;
- health and safety risks; or
- concealment of information relating to any of the above.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases you should follow the appropriate HR policy.

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Any incidences of harassment or victimisation of any person raising a concern under this policy will be dealt with under section 7.

#### 4. How do I raise a whistleblowing matter?

If you have any allegation or concern relating to any of the above you should report it under this policy as soon as you become aware of it. Any matters raised under this policy will be treated seriously and in confidence.

Although issues and concerns can be raised under this policy at any time, prompt notification is usually needed to ensure the issue or concern can be investigated and appropriate action taken. Prompt disclosure also assists the City & Guilds Group to maintain high standards of compliance and to prevent destruction of evidence which might be required in an investigation (whether by City & Guilds Group or an external organisation).

You are encouraged to report issues and concerns following the steps below:

- raise your issue or concern with your line manager (either verbally or in writing);
- if: (1) you believe that your line manager has not addressed your concern; or (2) you prefer not to raise it with them for any reason, you should contact one of the following:
  - email [whistleblowing@cityandguilds.com](mailto:whistleblowing@cityandguilds.com), which is accessible by certain members of Legal and HR;
  - Director of Legal / Secretary to the Institute;
  - Head of HR Professional Services;
  - Management Board member;
  - Chief Executive Officer; and/or
- if you feel concerned about raising the issue internally or if you wish to remain anonymous, you should contact Public Concern at Work on 020 7404 6609 or via e-mail on [helpline@pcaw.co.uk](mailto:helpline@pcaw.co.uk) ("PCAW"). They can also provide confidential advice and support about whistleblowing.

**There is no requirement for you to provide any evidence at the stage of reporting the issue or concern under this policy. However, you may need to provide documents and emails that you have as part of the investigation.**

#### 5. External disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing within the City & Guilds Group. In most cases you should not find it necessary to alert anyone externally.

Not only could external disclosure be contrary to your obligations of confidentiality to the City & Guilds Group but it could also prejudice any investigation that we and/or an external body decide to undertake.

We strongly encourage you to seek advice from PCAW before reporting a concern to anyone external. Please remember that you are under obligations of confidentiality to the City & Guilds Group.

#### 6. Investigation and outcome

Once you have raised an issue or concern, we will:

- arrange a meeting with you as soon as possible to discuss it - you may bring a colleague or a union representative to any meetings but they must respect the confidentiality of your disclosure and any subsequent investigation;
- carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment; and

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- conduct additional meetings with you as may be necessary to obtain further information or to progress the investigation.

We may appoint an investigator or team of investigators (including staff with relevant experience of investigations or specialist knowledge of the subject matter). The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

The City & Guilds Group aims to provide feedback to you on the progress of an investigation and its likely timescale.

Where the investigation provides evidence of potential wrongdoing by an individual or individuals, City & Guilds Group will invoke its disciplinary processes and any proven allegations may result in disciplinary action up to and including immediate dismissal for an employee or termination of the contract between the relevant member of the City & Guilds Group and a third party.

## 7. Protection and support for whistleblowers

As long as you have a reasonable belief that wrongdoing is taking place, you can expect to be supported by the City & Guilds Group in reporting issues and concerns. You will not be risking your job or harassment or victimisation. Anyone who is suspected of victimising or harassing a whistleblower may face investigation and disciplinary action under the relevant City & Guilds Group disciplinary procedure.

The City & Guilds Group encourages staff, consultants, contractors and suppliers to voice whistleblowing concerns openly under this policy. If you raise an issue or concern confidentially, we will make every effort to protect your identity and will not disclose it without your consent, unless we are required to do so by law. If it is discovered that the issue cannot be resolved without the disclosure of identity, this would be discussed with you.

**Deliberately false allegations are not acceptable and anyone making such allegations may face investigation and disciplinary action or termination of a contract for services.**

## 8. Monitoring and review

The Head of HR Professional Services has overall responsibility for the operation of this policy. A record of concerns raised will be kept by Legal and reported quarterly and confidentially to the Audit and Risk Committee by Legal.

Each Director responsible for a Business Unit has been instructed to implement this policy to ensure that:

- it is communicated to all employees;
- each member of their directorate understands it is a disciplinary offence to prevent anyone from reporting a concern; and
- all reported allegations are promptly investigated.

## 9. Advice and support

For those in the United Kingdom, advice may be sought from:

- PCAW - an independent charity which has lawyers who provide confidential advice, free of charge, to people concerned about wrongdoing at work. They can be contacted by telephone on 020 7404 6609 or via e-mail on [helpline@pcaw.co.uk](mailto:helpline@pcaw.co.uk).
- Employee Assistance Programme – a confidential support and advice service which can be contacted by telephone on 0800 282193. Please note, this service cannot be used to raise a concern under this policy (see section 4 for how to raise a concern).

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