



Developing the Future

Whistleblowing Policy

V1.2 last updated 15th May 2021



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Whistle-blowing Policy Statement

'Whistleblowing' is the term used when you pass on information or concerns that you have relating to our company.

The Coders Guild aims to create and nurture a culture that is open and supportive for all of our staff and stakeholders. We would like to reassure all of our employees, apprentices, trainees and stakeholders that we are committed to the highest possible standards of openness and accountability. As such, we expect everyone to feel comfortable enough to raise serious concerns about any aspect of our work without fear of victimisation or subsequent discrimination or disadvantage.

We are aware of our legal responsibility to ensure that there are mechanisms in place to enable you to raise legitimate concerns, along with setting out what external redress you have if you believe the concern raised has not been satisfactorily resolved.

Whistle-blowing Policy Principles

This policy applies to all of our employees, associates, apprentices, trainees, agency workers, consultants or self-employed staff.

The aims of the policy are to:

- Encourage individuals to feel confident about raising serious concerns and to question and act upon concerns relating to our practice;
- Provide avenues for you to raise concerns and receive feedback on any action that is taken;
- Ensure that you receive a response to concerns raised and that you are aware of how to pursue them if you are not satisfied;
- Reassure you that you will be protected from possible reprisals or victimisation if you have reasonable belief in the concerns raised and you have made the disclosure in good faith.

Responsibility for the Whistle-blowing Policy

Our Leadership team has overall responsibility for the effective operation of this policy and for ensuring compliance with the relevant statutory framework. The Leadership team has delegated day-to-day responsibility for operating the policy and ensuring its maintenance and review at least annually.

Anyone in receipt of a complaint must report concerns raised to the Director, Crispin Read, who will keep a record of this along with the outcome, while maintaining confidentiality. The Director has a specific responsibility to ensure the fair application of this policy and all of our employees and associates are responsible for supporting colleagues and ensuring its success.

When to use this Policy

You should use this policy when you genuinely believe that our company or a colleague has taken, is intending, or has failed to act which you reasonably believe will lead or amount to:

- A criminal offence (such as fraud);
- Financial mismanagement (such as fraud, stealing assets or the improper use of assets);
- Failure to comply with any legal obligations;
- A miscarriage of justice;
- Danger to the health and safety of an individual;
- Damage to the environment;
- The deliberate concealment of information relating to the concerns listed above.

This policy should not be used to address issues relating to your employment. The grievance policy should be used for these matters.

Implications of Raising a Concern

We are committed to good practice and high standards and we want to be supportive of you. If you reasonably believe that your concern relates to any of the areas set out above and you disclose the information to the appropriate person in good faith, no action will be taken against you for making the disclosure.

If you are found to be victimising a colleague for using this policy or you deter a colleague from using this policy to raise genuine concerns, you may be subject to formal action via the Disciplinary policy.

If a disclosure or allegation is found to be malicious or vexatious and has been made for personal gain or there were no reasonable grounds for believing that the information was accurate, the Disciplinary policy will apply.

Confidentiality and Anonymity

This policy does not affect the duty of confidentiality. Consequently, in using this policy, you must not disclose commercially sensitive data or unrelated confidential information.

It is important that concerns are dealt with sensitively and quickly. This policy encourages you to put your name on the allegation wherever possible. Anonymous disclosures are strongly discouraged as they are much less powerful. However, they would still be investigated at our discretion. In exercising discretion, the following factors are taken into account:

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- The seriousness of the issues raised;
- The credibility of the concern;
- The likelihood of confirming the allegation from attributable sources.

Where information is disclosed in accordance with this policy, insofar as is reasonably practical, your identity will be kept confidential. At the appropriate time, however, you may need to come forward as a witness.

How to Raise Concerns

Concerns should be raised with the Director, Crispin Read. However, depending on the seriousness and sensitivity of the issue and who is suspected (or where there are doubts), the concern may be made to another member of the Leadership team.

You should, as soon as possible, raise your concerns in writing giving the details of the background and history (including dates where possible) and stating the reason for your concern. You will need to demonstrate to the person that you are contacting that there are reasonable grounds for the concern, although proof beyond reasonable doubt is not necessary.

You may wish to consider discussing the concern with a colleague first. It may be easier to raise the matter if there are colleagues to support you. However, care should be exercised in respect of confidentiality on the part of everyone concerned.

You may ask a colleague to accompany you to any meeting in connection with the investigation.

Our Response

We will respond to your concerns within 5 working days of you raising your concern with us.

In order to protect you and those accused under this policy, initial enquiries will be made to decide whether an investigation is appropriate and if so, how it should progress. The overriding principles, which we will have in mind, are our customers, our employees, our apprentices and the public's interest.

Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required, this will be taken before any investigation is conducted.

Within a reasonable period of a concern being raised, and if possible, within 14 days, the responsible person will write to you to:

- Acknowledge receipt of your concern;
- Indicate how we will deal with the matter;
- Give an estimate of how long it will take to provide a final response;

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- Advise whether any initial enquiries have been made;
- Advise where you may obtain support;
- Advise whether further investigation will take place and if not, why not.

The amount of contact between managers considering the issue and you will depend on the nature of the matter raised and the clarity of the information provided.

We will take steps to minimise any difficulties, which you may experience as a result of raising a concern. For instance, if you are required to give evidence as a witness in criminal or disciplinary proceedings, we will arrange for you to receive independent advice concerning the process.

We accept that you need to be reassured that we have addressed matters and are subject to legal constraints, we will inform you of the outcome.

Taking Further Action

This policy is intended to provide you with an avenue to raise your concerns and have them addressed. If you are not satisfied with the outcome and consider it appropriate to take the matter outside the company, the following are possible contact points for you to consider:

- ACAS
- Public Concern at Work;
- Citizens Advice Bureau;
- Relevant professional bodies / regulated organisations;
- Police.

If you do take the matter outside of the company, care should be taken to ensure that there are no disclosures of confidential and / or commercially sensitive or unrelated confidential information without the proper authorisation.

If you are not able to check this with us, you must check with the person with whom you make the external contact in order to protect them.

Contact details

Nominated Whistleblowing Lead

Name: Crispin Read

Email: crispin@thecodersguild.org.uk

We are committed to reviewing our policy and good practice annually.

This policy was last reviewed on: 15th May 2021