

Whistleblowing Policy

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Author
Kelland Dickens

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Policy

City Gateway is committed to the principles of operating in a legal and ethical manner. City Gateway has established its Code of Business Conduct that forms the basis upon which City Gateway conducts its activities. City Gateway is also committed to complying with all relevant laws and regulations that apply to the company and its employees. City Gateway is dedicated to the prevention, avoidance, detection and investigation of non-compliance, including fraud and corruption.

Consistent with this commitment, City Gateway encourages its employees who have concerns about suspected serious misconduct to come forward and express these concerns without fear of retaliation or unfair treatment.

Accordingly, City Gateway has established this Whistleblowing Policy, which outline a procedure for employees to report their concerns about serious misconduct by City Gateway or a City Gateway employees regarding:

- a criminal offence
- failure to comply with any legal duty
- a miscarriage of justice (or deliberate and serious misrepresentation of information that would lead to a miscarriage of justice)

- a danger to the health and safety of any individual, including risks to the public
- damage to the environment
- instances of slavery, servitude, forced and compulsory labour and human trafficking in CG or anywhere in its supply chain
- any deliberate attempt to conceal any of the above.

The Trustees of City Gateway have delegated the responsibility for implementing this Whistleblowing Policy to the CEO who is:

Name: David Wesson

Title: CEO

Address: The Pavilion, Import Building, 2 Clove Crescent, London, E14 2BE

Email: david.wesson@citygateway.org.uk

This Whistleblowing Policy applies to all City Gateway employees

Safeguards/Confidentiality

City Gateway will not tolerate punishment or unfair treatment of any employee who reports concerns in good faith or who participates in an investigation of any such reports. Retaliation against an individual for reporting in good faith any violation or for participating in any such investigation is a serious violation of the City Gateway's Code of Business Conduct that will subject the violator to appropriate disciplinary action, including the possible termination of employment. Any such retaliation should be immediately reported to the CEO. If after investigation the reported concerns cannot be confirmed or do not have substance, no action will be taken against the employee if the concern was raised in good faith. However, as investigations are costly and potentially damaging, if an employee raises a concern that is determined to have been made maliciously or without any reasonable basis, City Gateway may take appropriate action against the employee.

City Gateway recognises that some employees may want to raise a concern in confidence under this Policy. Confidentiality will be maintained to the extent possible. However, in some circumstances it may be obvious who has raised the concern or filed a report, or the investigation itself may lead to a point where a statement is required or the individual is called upon to provide evidence. In circumstances where finding maintaining complete confidentiality hinders the truth or where it may be required under law or regulation, City Gateway cannot guarantee the confidentiality of the reporting employee.

City Gateway encourages employees not to make anonymous reports as it can hinder or complicate investigations and possibly prevent appropriate action from being taken. However, if an employee believes there is no other way to report their concern than to make an anonymous report, then the employee may do so.

Making a Report

City Gateway recognizes that employees are often the first to notice that there may be something wrong within the company. Most concerns are of a relatively minor nature and can be, and should be, resolved through normal channels.

Employees wishing to raise a specific concern are encouraged to directly and openly discuss their concern first with their Line Managers, as this is the fastest and preferred way to resolve any issues and the best way to ensure a good and open work environment. If a specific procedure is in place locally, employees can also make reports via such procedure.

If an employee does not feel comfortable raising concerns with his or her Line Manager or via the grievance procedures within the charity, the employee may go to the Human Resources Department.

If an employee does not feel comfortable raising concerns via the methods above, or the report has not been dealt with satisfactorily, then the individual can raise the issue with the CEO.

If the allegation pertains to the CEO or the CEO has not dealt with the report satisfactorily, then the reporting employee may report directly to the Trustees.

If the allegation pertains to any member of the Trustees then the reporting employee may report directly to the Chairman of the Board of Trustees.

Employees may raise their concerns in a face-to-face meeting, or by telephone, letter, fax or email. All reports should provide background and the reason for the concern, together with names, dates, places and as much other information as possible.

Employees should avoid any form of external communications regarding any reports unless internal investigations have been completed and all internal alternatives have been exhausted.

Employees who make a report will not be expected to prove the truth of their allegation, but they should be able to demonstrate that there are sufficient grounds to have a reasonable belief that something is wrong. Employees are encouraged to raise their concerns at the earliest possible stages so that timely action may be taken.

Management Responsibility

Management at all levels must handle all reports seriously, confidentially and promptly. All evidence and documentation should be preserved.

The Line Manager to which the report was initially made shall promptly inform the CEO of the report and management's recommendation on how to proceed.

The CEO will report regularly to the Board and as appropriate with regard to specific employee report.

Unless the report was made anonymously, and unless otherwise inappropriate, the employee making the report will be informed of the status of the report.