

Whistleblowing Policy



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Document Control

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Version No	Lead	Date change implemented	Reason for change
1	Data Protection Officer	14 April 2019	Point 4.3 and sections 6,7 and 8 added
2	Head of HR	August 2020	Following review by Gowlings

Consultation History

Position	Organisation
Chief Legal Officer	Birmingham Organising Committee for the 2022 Commonwealth Games Limited
Head of Financial Management	Birmingham Organising Committee for the 2022 Commonwealth Games Limited
Workforce and Games Services Director	Birmingham Organising Committee for the 2022 Commonwealth Games Limited

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1. Principles

- 1.1 This is Birmingham 2022's policy on whistleblowing. It is intended to help create a culture where wrongdoing can be addressed quickly and effectively, by encouraging employees and others who have serious concerns about any aspect of Birmingham 2022's operations to come forward and voice those concerns.
- 1.2 Birmingham 2022 is committed to conducting its business with honesty, propriety and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.
- 1.3 Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, facilitating tax evasion, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.
- 1.4 This policy covers all employees, officers, consultants, contractors, volunteers, interns, casual workers and agency workers (referred to collectively in this policy as "staff").
- 1.5 This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. How to raise a concern

- 2.1 Birmingham 2022 hopes that in most cases staff will be able to raise any concerns with their manager. However, where an individual prefers not to raise it with their manager for any reason, they should contact the Whistleblowing Officer, Caroline McGrory, who is also the Chief Legal Officer at Caroline.McGrory@birmingham2022.com.
- 2.2 If the concern involves Birmingham 2022's Whistleblowing Officer, then the individual raising the concern should contact Birmingham 2022's Chief Executive Officer instead at Ian.Reid@birmingham2022.com.
- 2.3 Birmingham 2022 will arrange a meeting with the individual raising the concern as soon as possible to discuss the issue. The individual may bring a colleague or trade union representative to any meetings held under this policy. Any companion must respect the confidentiality of the disclosure and any subsequent investigation.
- 2.4 If the concern is related to suspected fraud, bribery or corruption, this should be dealt with via Birmingham 2022's Anti-Corruption, Counter-Fraud, Bribery, Gifts and Gratuities Policy.

3. Confidentiality

- 3.1 Birmingham 2022 hopes that all staff will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If an

individual wants to raise their concern confidentially, Birmingham 2022 will make every effort to keep the individual's identity secret and only reveal it where necessary to those involved in investigating the concern.

4. External disclosures

4.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases staff should not find it necessary to alert anyone externally.

4.2 The law recognises that in some circumstances it may be appropriate for individuals to report their concerns to an external body such as a regulator. Staff can always seek advice about reporting a concern to an external body and Birmingham 2022 strongly encourages you to do so. The independent organisation 'Protect' operate a confidential helpline. Their contact details are as follows:

Helpline: (020) 3117 2520

E-mail: whistle@protect-advice.org.uk

Website: www.pcaw.org.uk

4.3 In the event that a member of staff does not feel their concerns have been appropriately dealt with internally, they have an entitlement under the Public Interest Disclosure Act 1998 to make a complaint to an external body. The Prescribed Persons Order 2014 sets out a list of over 60 organisations and persons that individuals may approach outside their workplace to report suspected or known wrongdoing. A list of these bodies can be found at:

<https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies>

5. Protection and support for whistleblowers

5.1 Birmingham 2022 aims to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

5.2 Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If any individuals believe that they have suffered any such treatment, they should inform the Whistleblowing Officer immediately. If the matter is not remedied to their satisfaction, staff should raise it formally using our Grievance Policy.

5.3 No staff member must threaten or retaliate against whistleblowers in any way. If anyone is involved in such conduct they may be subject to disciplinary action under our Disciplinary Action Policy.

5.4 If Birmingham 2022 concludes that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action under our Disciplinary Action Policy.

6. Monitoring

6.1 The Chief Legal Officer will monitor the implementation of this policy and any subsequent revisions. This will include:

- Monitoring incidents of internal reports of whistleblowing with a view to making any necessary amendments to the content of this or other related policies and procedures; and
- Monitoring whistleblowing concerns made by individuals to external bodies of which the Chief Legal Officer has been made aware.

7. Review

7.1 This policy will be subject to review biannually after its date of approval. Earlier review may be required if any of the following occur:

- The adoption of the policy highlights any errors or omissions in its content.
- Following monitoring of whistleblowing incidents by the Chief Legal Officer, amendments are required to the content of the policy.
- Where relevant changes in legislation or national guidance impact upon the content of this policy.