

## **C40 Cities Climate Leadership UK (C40 UK) Whistleblowing Policy**

This policy applies to all trustees, officers, employees, associates, sub-contractors, volunteers and members of C40 UK. It does not form part of any employee's contract of employment and we may amend it at any time

### **Introduction**

Employees are often best placed to realise if there is something seriously wrong within C40 UK. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the organisation. They may also fear harassment or victimisation. In these circumstances, it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.

C40 UK is committed to the highest possible standards of openness, probity and accountability. In line with that commitment we expect employees, members and others that we deal with who have serious concerns about any aspect of the charity's work to come forward and voice those concerns..

We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.. This whistleblowing policy is intended to encourage and enable employees to raise serious concerns within the charity rather than overlooking a problem or airing their complaints outside the charity.

A copy of this Whistleblowing Policy will be available to all trustees, officers and employees of the organisation and to volunteers who provide substantial services to C40 UK.

### **Aims and Scope**

This policy is designed to enable all trustees, officers, employees, associates, sub-contractors, volunteers and members of C40 UK to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety.

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes

- bribery,
  - fraud or other criminal activity,
  - miscarriages of justice,
  - health and safety risks,
  - damage to the environment;
  - any breach of legal or professional obligations.
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- Financial malpractice, impropriety or fraud, accounting or audit irregularities, bribery or misuse of assets;
  - Failure to comply with a legal obligation or statutes;
  - Dangers to Health & Safety or the environment;
  - Conduct which is a breach of the law;
  - Improper behaviour or unethical behaviour; and
  - Attempts to conceal any of these.

The Grievance Policy should be used for complaints relating to your own personal circumstances, such as the way you have been treated at work, and this whistleblowing policy should not be used for this.

This policy aims to:

- encourage you to feel confident in raising concerns and to question and act upon concerns about practice, in the knowledge that those concerns will be taken seriously and investigated as appropriate, and that your confidentiality will be respected.
- to provide you with guidance as to how to raise those concerns
- to reassure you that you should be able to raise genuine concerns without fear of reprisals or victimisation, even if you turn out to be mistaken

### **Safeguards**

It is understandable that whistleblowers are sometimes worried about possible repercussions.

We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer immediately.

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action. C40 UK will not tolerate any such harassment or victimisation (including informal pressures).

However, if we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.

C40 UK is committed to good practice and high standards and wants to be supportive of employees.

C40 UK recognises that the decision to report a concern can be a difficult one to make.

### **Confidentiality**

C40 will treat all such disclosures in a confidential and sensitive manner.

We hope that staff will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate.

If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

### **Anonymous Allegations**

Completely anonymous disclosures are difficult to investigate.

This policy encourages individuals to put their name to any disclosures they make.

Proper investigation may be more difficult or impossible if we cannot obtain further information from you.

It is much more difficult to establish whether anonymous concerns are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowing Officer and appropriate measures can then be taken to preserve confidentiality

### **Mistaken Allegations**

We will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

### **False allegations made maliciously or with a view to personal gain**

If we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower will be subject to disciplinary action.

### **How to raise a concern**

We hope that in many cases you will be able to raise any concerns with your manager or their manager..

However, where the matter is more serious, or you feel that your manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the following:

- Whistleblowing Officer
- Executive Director
- Chair of Trustees

Contact details are set out at the end of this policy.

Who to direct the concern to depends on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice.

For example,

- if the allegation is about management then concerns should be directed to the Executive Director; ).
- Complaints against the Executive Director should be directed to the Chair of Trustees.
- Complaints against Trustees may be directed to the Executive Director or the Chair of Trustees (unless the Chair is the focus for the complaint).

Concerns may be raised verbally or in writing. Staff who wish to make a written report should mention the following

- the background and history of the concern (giving relevant dates); and
- the reason for the concern.

Staff should report the concern at the earliest opportunity so that action can be taken.

Although staff are not expected to prove beyond doubt the truth of an allegation, they will need to demonstrate to the person contacted that there are reasonable grounds for concern.

The complainant has the right to bypass the line management structure and take their complaint direct to the Executive Director or Chair of Trustees if the individual genuinely believes this is appropriate and in line with this policy. The Chair has the right to refer the complaint back to management if he/she feels that the management without any conflict of interest can more appropriately investigate the complaint.

We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

### **Investigation**

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

In some cases 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.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

### **Timescales**

Due to the varied nature of these sorts of complaints, which may involve internal investigators and / or the police, it is not possible to lay down precise timescales for such investigations. The investigating officer should ensure that the investigations are undertaken in a timely manner without affecting the quality and depth of those investigations.

### **If you are not satisfied**

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.

If you are not happy with the way in which your concern has been handled, you can raise it with the Whistleblowing Officer.

### **Responsibility for the policy and Whistleblowing Officer**

The Executive Director has overall responsibility for the maintenance and operation of this policy. He or she will maintain a record of concerns raised and the outcome (but in a form which does not endanger confidentiality) and will report as necessary to the Board of C40 UK.

The Whistleblowing Officer has day-to-day operational responsibility for this policy, and must ensure that all managers and other staff who may deal with concerns or investigations under this policy receive regular and appropriate training.

This policy will be reviewed on a regular basis.

All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Whistleblowing Officer

**External disclosures**

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

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

**Contact details**

Whistleblowing officer: Kevin Austin  
Executive Director: Mark Watts  
Chair of Trustees: Antha Williams

Public Concern at Work (independent charity)  
Helpline: (020) 7404 6609  
E-mail: [whistle@pcaw.co.uk](mailto:whistle@pcaw.co.uk)  
Website: [www.pcaw.co.uk](http://www.pcaw.co.uk)