



WHISTLEBLOWING POLICY

1. INTRODUCTION

- 1.1 Employees are often the first to realise that there may be something seriously wrong within City Building (Glasgow) LLP. 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.
- 1.2 City Building (Glasgow) LLP is committed to the highest possible standards of openness, probity and accountability. In line with that commitment we expect employees and others with serious concerns about any aspect of City Building (Glasgow) LLP's work to come forward and voice those concerns. It is recognised that certain cases will have to proceed on a confidential basis. This policy document makes it clear that employees can do so without fear of reprisals. This Whistleblowing Policy is intended to encourage and enable employees to raise serious concerns within the organisation rather than overlooking a problem or blowing the whistle to the media or other external bodies.
- 1.3 This policy has been discussed with the relevant Trade Unions and professional organisations and has their support.

2. AIMS AND SCOPE OF THE POLICY

- 2.1 This policy aims to:
- provide avenues for employees to raise concerns and receive feedback on any action taken
 - inform employees on how to take the matter further if they are dissatisfied with the response, and
 - reassure employees that they will be protected from reprisals or victimisation for whistleblowing in good faith
- 2.2 There are existing procedures in place to enable employees to lodge a grievance relating to their own employment. This Whistleblowing Policy is intended to cover concerns that fall outside the scope of other procedures. That concern may be about something that:-
- is unlawful; or
 - is against City Building (Glasgow) LLP's Standing Orders or policies; or
 - falls below established standards or practices; or
 - amounts to improper conduct

3. SAFEGUARDS

3.1 Harassment or Victimisation

City Building (Glasgow) LLP recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. The organisation will not tolerate harassment or victimisation and will take action to protect employees when they raise a concern in good faith.

This does not mean that if a member of employees is already the subject of disciplinary or redundancy procedures, that those procedures will be halted as a result of their whistleblowing.

3.2 Confidentiality

City Building (Glasgow) LLP will do its best to protect an individual's identity when s/he raises a concern and do not want their name to be disclosed. It must be appreciated, however, that the investigation process may reveal the source of the information and a statement by the individual may be required as part of the evidence.

3.3 Anonymous Allegations

This policy encourages employees to put their names to allegations. Concerns expressed anonymously are much less powerful, but they will be considered at the discretion of the organisation. In exercising this discretion, the factors to be taken into account would include:

- the seriousness of the issue raised
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources

3.4 Untrue Allegations

If employees make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against them. If, however, individuals make malicious or vexatious allegations, disciplinary action may be considered and implemented.

4. RAISING A CONCERN

4.1 For some minor issues (e.g. personal use of City Building (Glasgow) LLP equipment, abuse of flexi-time), employees should normally raise concerns with their immediate manager or their superior. In general, however, the whistleblowing procedure is expected to be used for potentially more serious and sensitive issues (e.g. corruption, fraud) and the first step will be to approach your senior manager (unless s/he or senior management is the subject of the complaint in which case the Managing Director should be informed). Should the complaint be found by the Managing Director to be substantiated, s/he will consult with the Board on referring it to the appropriate body (e.g. Standards Committee, Ombudsman). All employees can raise concerns directly with the Ombudsman should they be unhappy with the internal investigation.

4.2 Concerns are better raised in writing. The background and history of the concern, giving names, dates and places where possible, should be set out and the reason why the individual is particularly concerned about the situation. Those who do not feel able to put their concern in writing can telephone or meet the appropriate officer.

- 4.3 The earlier the concern is expressed, the easier it is to take action.
- 4.4 Although employees are not expected to prove the truth of an allegation, they will need to demonstrate to the person contacted that there are sufficient grounds for concern.
- 4.5 Advice and guidance on how matters of concern may be pursued can be obtained from the HR Section.
- 4.6 Individuals may invite their Trade Union or professional association to raise a matter on their behalf.

5. HOW THE COMPLAINT WILL BE DEALT WITH

- 5.1 The action taken by City Building (Glasgow) LLP will depend on the nature of the concern. The matters raised may:
- be investigated internally
 - be referred to the Police
 - be referred to the external Auditor
 - form the subject of an independent inquiry by the Ombudsman
- 5.2 In order to protect individuals and City Building (Glasgow) LLP, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations which fall within the scope of other, existing, procedures (e.g. discrimination issues) will normally be referred for consideration under those procedures.
- 5.3 Some concerns may be resolved by agreed action without the need for investigation.
- 5.4 Within 10 working days of a concern being received, City Building (Glasgow) LLP will write to the complainant:
- acknowledging that the concern has been received
 - indicating how it proposes to deal with the matter
 - giving an estimate of how long it will take to provide a final response
 - telling them whether any initial enquiries have been made; and
 - telling them whether further investigations will take place, and if not, why not
- 5.5 The amount of contact between the body considering the issues and the complainant, will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought from the individual.
- 5.6 When any meeting is arranged, employees have the right, if they so wish, to be accompanied by a Trade Union or professional association representative or a friend who is not involved in the area of work to which the concern relates.
- 5.7 City Building (Glasgow) LLP will take steps to minimise any difficulties which employees may experience as a result of raising a concern. For instance, if employees are required to give evidence in criminal or disciplinary proceedings, the Company will advise them about the procedure.
- 5.8 City Building (Glasgow) LLP accepts that employees need to be assured that the matter has been properly addressed. Thus, subject to legal

constraints, employees will receive information about the outcomes of any investigations.

6. ALTERNATIVE METHODS OF TAKING FORWARD A COMPLAINT

6.1 This policy is intended to provide employees with an avenue to raise concerns with City Building (Glasgow) LLP or the Ombudsman. City Building (Glasgow) LLP hopes this will satisfy employees. If an individual feels it is right to take the matter outside this process, the following are possible contact points:

- the local Council member (if you live in the area of Glasgow)
- the external Auditor
- relevant professional bodies or regulatory organisations
- individuals' solicitors
- the Police

6.2 If employees do take the matter outside City Building (Glasgow) LLP they need to ensure that they do not disclose confidential information or that disclosure would be privileged. This can be checked with the Ombudsman who will also advise on ways to proceed.

7. THE RESPONSIBLE OFFICER

The Executive Director has overall responsibility for the maintenance and operation of this policy. A record of concerns raised is maintained and the outcomes (but in a form which does not endanger confidentiality) and will report as necessary to the Board.

8. CONTACT DETAILS

Head Office: 350 Darnick Street
Springburn
Glasgow
G21 4BA

Tel No: 0141 287 2200

Audit Section: Tel No: 0141 287 2343