

# **WHISTLEBLOWING POLICY**

## **(Revised November 2016)**

### **The aim of this policy**

ECC is committed to achieving high standards of integrity and accountability.

This policy provides a framework for employees, consultants or contractors, to raise concerns which they believe are in the public interest and may relate to illegal, improper or unethical conduct.

This policy should be used where there are concerns about the consequences for other employees or the public and does not apply to personal grievances.

### **Principles**

ECC is committed to achieving high standards of integrity and accountability and expects the same commitment from employees and those working for ECC.

ECC aims to provide an open environment so that employees and those working for ECC can raise issues considered to be in the public interest, with the confidence that they will be acted upon appropriately.

Employees will be protected from detrimental treatment i.e. victimization or dismissal, if they raise concerns in good faith.

This procedure complies with the Public Interest Disclosure Act 1998.

# **Whistle-blowing procedure**

## **Definition of whistle-blowing**

Whistle-blowing is the formal raising of concerns that are in the public interest (Referred to as public interest disclosures).

Examples of concerns that may be in the public interest are shown below. This list is not exhaustive.

### **Public interest disclosures**

- Criminal offences;
- Failure to comply with legal obligations;
- Actions that endanger the health or safety of any individual;
- Actions that cause damage to the environment;
- Actions that are intended to conceal any of the above.

## **Raising a concern - the process**

Employees are encouraged to raise their concerns with you as their line manager. Should you receive a concern you should:

- Clarify what the employee alleges;
- assess what action should be taken;
- record the employee's concern on the whistle-blowing investigation log;
- you will need to ensure the incident is reported to HR Advice and Support;
- HR Advice and Support will be able to provide any additional assistance if required;
- depending on the nature of the concern, the matter may be referred to an auditor, the police or another independent body;
- decisions and any remedial action should be clear and fully documented on the investigation log;
- you will need to send the completed whistle-blowing investigation log to the Counter Fraud Team (Internal Audit) for their records.

If the employee feels unable to raise the matter with you or they believe that you have failed to take appropriate action, they can raise the matter with a more senior manager. HR Advice and Support, Counter Fraud Team (Internal Audit), or ECC's Monitoring Officer.

Where the employee feels unable to raise the concern with anyone within ECC they should contact Expolink (an external whistle-blowing service provider) who will record their concern and send a report to the relevant person within ECC to investigate.

At the conclusion of the investigation, the employee should be advised that the matter has been dealt with, and the outcome recorded on the confidential whistle-blowing investigation log.

## **Concerns raised in confidence**

Where a concern is raised in confidence, an employee's identity will be protected and will not be disclosed without their consent.

Any concerns raised anonymously will also be considered, but may prove more difficult to investigate due to the anonymous status.

## **Written records**

The Monitoring Officer, in conjunction with Internal Audit, will maintain a written record of concerns raised and the outcomes. This will be in a form which does not breach employee confidentiality. The Monitoring Officer will report as necessary to the Audit Committee.

## Whistleblowing Procedure Flow Chart

