

Whistleblowing Policy

Revision history

| Version | Revisions made | Date approved | Approved by |
|---------|---|-------------------|--------------------------|
| 1.4 | Owner Changed | 26.09.2008 | Judith Shepherd |
| 2 | | 24 October 2011 | Management Board |
| | | 24 November 2011 | Audit and Risk Committee |
| 3 | Amendments in line with the Enterprise and Regulatory Reform Act 2013 | 22 August 2014 | Management Board |
| | | 11 September 2014 | Audit and Risk Committee |
| 3.1 | General update | 17 November 2016 | Audit and Risk Committee |
| 3.2 | Update to Protection for Whistleblowers | 3 March 2020 | Group Legal |
| 3.3 | General update | 9 June 2021 | Group Legal |
| 3.4 | General update | 16 March 2022 | Legal Department |
| 3.5 | Update of contact details | 20 July 2022 | Legal Department |
| 3.6 | Update to include alternative reporting options | 25 April 2023 | Legal Department |

1. Introduction

City & Guilds is committed to the highest standards of conduct and integrity in its business activities in the UK and overseas. This requires honesty and integrity in all areas of the business and a culture of openness between all staff, contractors and suppliers.

We encourage those that have any concerns about any aspect of the work of City & Guilds to come forward and voice those concerns. We recognise that whistleblowing and questioning the activities of others can be difficult. To support you with this, or if you think you have something to report but are not sure how, or are worried about anything, please contact www.protect-advice.org.uk. Protect is an external organisation which provides free and confidential advice and support about whistleblowing.

The purpose of this policy is to:

- provide information on how to identify situations that may represent wrongdoing (see section 3);
- provide information on how to report allegations of wrongdoing (see sections 4 and 5); and
- give reassurance to those reporting concerns of wrongdoing that they are protected from adverse consequences (see section 8).

In this policy, the term City & Guilds means:

- UK companies which are owned or controlled directly or indirectly by The City and Guilds of London Institute; and
- Companies outside the UK which are owned or controlled directly or indirectly by The City and Guilds of London Institute.

2. Scope

This policy applies to:

- all individuals working for City & Guilds at all levels and grades, including the Trustees, the Chief Executive Officer, all directors, senior managers, and employees (whether permanent or fixed-term) and temporary workers, wherever located (**worker**); and
- contractors and suppliers of City & Guilds.

Companies that are not wholly owned subsidiaries (as set out in the Legal Department's Legal Structure document) are out of scope of this policy.

3. What is whistleblowing?

Whistleblowing is the process whereby an individual can raise a concern about suspected wrongdoing or malpractice within City & Guilds.

A whistleblowing concern may include an action committed by an individual, a team, or by a third party in dealings with City & Guilds, which you feel constitutes one of the following:

- malpractice such as:
 - actions contrary to any City & Guilds policy;
 - actions contrary to any regulations set by a regulatory body to which City & Guilds is subject;
 - financial malpractice or maladministration; or
 - failure to follow financial, procurement and contract procedure rules;
- criminal offences or other unlawful activity such as fraud or corruption including accepting or paying bribes;
- environmental damage;

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- health and safety risks; or
- concealment of information relating to any of the above.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases you should refer to the appropriate HR policy.

4. How do I raise a whistleblowing concern?

If you have an concern relating to any of the above you should report it under this policy. If you are unsure if the concern you have should be reported please contact Protect: <https://protect-advice.org.uk/> Any matters reported under this policy will be treated seriously and in confidence, to the extent possible in the circumstances.

As a worker blowing the whistle you're protected by law; you should not be treated unfairly or lose your job because you 'blow the whistle'. Any incidences of harassment or victimisation of any worker raising a concern under this policy will be dealt with under section 8 below.

Although concerns can be raised under this policy at any time, prompt notification is usually needed to ensure the concern can be investigated and appropriate action taken. Prompt notification also assists City & Guilds to maintain high standards of compliance and to prevent destruction of evidence which might be required in an investigation (whether by City & Guilds or an external organisation).

You are encouraged to report concerns using one of the communication channels below, as appropriate in the circumstances:

- raise your issue or concern with your Line Manager (either verbally or in writing);
- if: (1) you believe that your Line Manager has not addressed your concern; or (2) you prefer not to raise it with them for any reason, you should email whistleblowing@cityandguilds.com, which is accessible by:
 - People Director
 - Co Head of Legal
 - Solicitor Apprentice

If you do not wish to email whistleblowing@cityandguilds.com, for example if the matter relates to a person who has access to this inbox, you may instead send an email to:

- Chair of the City & Guilds Trustee Board, Dr Ann Limb: ann.limb@cityandguilds.com
- People Director, Nic Barnes: nic.barnes@cityandguilds.com
- Co Head of Legal, Amber Cooper: amber.cooper@cityandguilds.com
- Co head of Legal, Chris Astles: chris.astles@cityandguilds.com

If the concern relates to Intertrain UK Limited, you may instead report the concern via:

Network Rail via the 'speak out' process available at <https://safety.networkrail.co.uk/>

CIRAS the Confidential Incident Reporting and Analysis System for the rail industry:

Online: <https://www.ciras.org.uk/Raise-a-concern>
 Phone: 0800 4101 101
 Freepost: CIRAS
 Text: 07507 285 887

Rail Sentinel in accordance with the Sentinel Scheme Rules

Online: <https://info.railsentinel.co.uk/>
 Phone: 0330 7262 222
 Email: sentinellInvestigations@networkrail.co.uk

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NSAR the National Skills Academy for Rail in accordance with the Rail Training and Assessment Scheme Rules (RTAS):

Email: FormalReview@nsar.co.uk

Recorded delivery: Chief Operating Officer, National Skills Academy Rail, 26th Floor, Millbank Tower, 21-24 Millbank, London SW1P 4QP

5. What to include?

There is no requirement for you to provide any evidence at the stage of reporting the issue or concern under this policy. However, you may need to provide documents and emails that you have as part of the investigation. For general guidance the following is useful to include in your email:

- the organisation or individual's name
- what is the suspected wrongdoing
- who is involved
- how long it has been going on
- where this is happening
- what is the impact
- if you have any supporting documents or evidence you can share with the investigator.

Any of the details you share with us will be stored securely and we limit access to this information to the extent possible in the circumstances.

6. External disclosures

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

Not only could external disclosure be contrary to your obligations of confidentiality to City & Guilds but it could also prejudice any investigation that we and/or an external body decide to undertake.

We strongly encourage you to seek advice from Protect before reporting a concern to anyone external to City & Guilds. Please remember that you are under obligations of confidentiality to City & Guilds. You may request advice on external disclosure from Protect here: <https://protect-advice.org.uk/>

7. Investigation and outcome

Once you have raised an issue or concern, we will:

- arrange a meeting with you as soon as possible to discuss the concern. You may bring a colleague or a union representative to any meetings but they must respect the confidentiality of your disclosure and any subsequent investigation;
- carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our initial assessment;
- conduct additional meetings with you as may be necessary to obtain further information or to progress the investigation.

We may appoint an investigator or team of investigators (including staff with relevant experience of investigations and/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.

Where appropriate, we will provide feedback to you on the progress of an investigation and its likely timescale.

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Where the investigation provides evidence of potential wrongdoing by an individual or individuals, City & Guilds may invoke its disciplinary processes and any proven allegations may result in disciplinary action up to and including dismissal for an employee or termination of the contract between City & Guilds and a contractor.

8. Protection and support for whistle blowers

As long as you have a genuine and reasonable belief that wrongdoing is taking place, as a worker, you can expect to be supported by City & Guilds in reporting issues and concerns. You will not be risking your job or harassment or victimisation. Anyone who is suspected of victimising or harassing a whistle blower may face investigation and disciplinary action under the relevant City & Guilds disciplinary procedure.

City & Guilds encourages workers, contractors and suppliers to voice whistleblowing concerns openly under this policy. If you raise an issue or concern confidentially, we will make every effort to protect your identity and will not disclose it without your consent, unless we are required to do so by law or there is a serious risk of health or safety. If it is discovered that the issue cannot be resolved without the disclosure of identity, this would be discussed with you.

Deliberately false allegations are not acceptable and anyone making such allegations may face investigation and disciplinary action or termination of a contract for services.

9. Monitoring and review

The Co Head of Legal has overall responsibility for the operation of this policy. A record of concerns raised is kept by the Legal Department, who report quarterly and confidentially to the Audit and Risk Committee.

Each Director responsible for a Business Unit has been instructed to implement this policy to ensure that:

- it is communicated to all employees;
- each member of their directorate understands it is a disciplinary offence to prevent anyone from reporting a concern; and
- all reported allegations are promptly investigated with due confidentiality.

This policy is kept under regular review and revised versions are issued as necessary.

10. Advice and support

For City & Guilds workers, independent advice and support may be sought from:

- Protect - an independent charity which has lawyers who provide confidential advice, free of charge, to people concerned about wrongdoing at work. Protect can be contacted using the contact details available on its website: <https://protect-advice.org.uk>
- [Employee Assistance Programme](#) – a confidential support and advice service which can be contacted by telephone on 0800 282193. Please note, this service cannot be used to raise a concern under this policy (see section 4 for how to raise a concern).

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