

## **CAMEO'S WHISTLE BLOWING POLICY**

### **Introduction**

- 1 This document sets out the procedure of Cameo in relation to whistle blowing.
- 2 Whistle blowing is the disclosure of wrong doing within the organisation; this can include fraud and financial irregularities, serious maladministration arising from the deliberate commission of improper conduct, unethical activities which may be of a criminal nature and dangerous acts or omissions which create a risk to health, safety or the environment.
- 3 It is not a mechanism for employees to raise private grievances.
- 4 An outcome of a complaint may result in action being taken under Cameo's Disciplinary Procedure for Staff or Code of Conduct.

### **Policy**

- 5 It is the aim of this procedure to enable concerns to be raised confidentially inside and, if necessary, outside the organisation.
- 6 Cameo is committed to tackling malpractice, and is itself regulated by having a Code of Conduct.

### **Confidentiality**

- 7 Any employee who raises a concern will have the right to have the matter treated confidentially, and not have their name disclosed to the alleged perpetrator of malpractice without their prior approval. If the matter is to be dealt with under Cameo's Disciplinary Procedure then the person who raised the concern will be asked to make a written signed statement.



8 Concerns can be raised orally or in writing. Where the concern is raised orally, a full note of the details should be made by the person hearing the concern.

### **Stage One – Raising the Concern**

9 All concerns should, in the first instance, be raised with the Operations Manager who will be responsible for investigating the concern. If, however, the allegations of malpractice are made against the Operations Manager, these should be raised to the Director.

10 The Operations Manager will send a written acknowledgement of the concern to the person raising it within two working days of being notified of the concern.

### **Stage Two – The Initial Appraisal**

11 The Operations Manager will normally undertake an appraisal of the complaint. Dependent on the nature of the complaint, internal or external audit may be the appropriate body to conduct an investigation or an investigation under Disciplinary Procedures or an appropriate independent body. If the complaint is against another member of staff, the Operations Manager in conjunction with the Director, will decide on the most appropriate method for an investigation. Normally, the individual against whom the concern is raised will be notified in writing that a concern has been raised, the nature of the concern and that it is being investigated. If they are seen during the course of the investigation, they have the right to be accompanied by a Trade Union Representative, a professional representative or friend of their choice.

12 If there is evidence of criminal activity, the policy should be informed to ensure that any internal investigation does not hinder a formal police investigation.



13 All concerns raised will be dealt with promptly, but the length of time to complete an investigation may vary according to the nature of the concern raised. Normally investigations will be completed within 15 working days.

### **Stage Three – Action**

14 On completion of the process, the Operations Manager will write to the person who raised the concern and, as far as possible, inform them of the outcome. The Operations Manager will also write to the person against whom the concern was raised and inform them of the outcome of the process and any subsequent action which will result.

15 Normally, the Operations Manager will seek advice from the Cameo's legal advisers before any action is taken, most cases will be dealt with under one of Cameo's internal procedures and, where criminal activity is suspected, the matter will also be referred to the police.

### **Stage Four – Follow up & Access to External Bodies**

16 If the person who raised the concern is not satisfied that the concern is being properly dealt with, that person has the right to raise it in confidence with the Audit Committee.

17 If Audit Committee finds that the allegation is unsubstantiated, the person raising the concern has the right of access to external bodies.

### **Malicious Accusations**

18 If any allegation is found to be malicious then it will be dealt with under Cameo's Disciplinary Procedure.