### Introduction

Whistleblowing is the disclosure of information which relates to suspected wrongdoing. This could be a suspected breach of legal, statutory or regulatory requirements, or unethical or immoral behaviour occurring in the business.

CMD is committed to conducting our business with honesty and integrity and it is expected that, by adhering to our policies and procedures, all our employees will maintain these high standards.

Businesses do face the risk of things going wrong occasionally, or of unknowingly having illegal or unethical practices occurring. Our employees are often the first to notice when someone in the company is doing something illegal or improper, and they may be worried about voicing their concerns.

This policy aims to:

* Give you an internal way for reporting, investigating and remedying any wrongdoing in the workplace.
* Encourage you to report suspected wrongdoing as soon as possible safe in the knowledge that your concerns will be taken seriously and investigated appropriately, and your confidentiality respected.
* Provide you with guidance on how to raise any concerns that you may have.
* Reassure you that you should be able to raise genuine concerns without fear or reprisal, even if those concerns turn out to be mistaken.

### Who does this policy apply to?

This policy applies to all CMD employees, including senior managers and directors, as well as consultants, contractors, home workers, casual and agency workers, volunteers and any other persons associated with us, wherever they are based.

### What concerns can I raise?

You can raise a concern about risk, malpractice or wrongdoing that you think is or may be harming the services we deliver or our business. A few examples of this may be (but are not restricted to):

* Financial malpractice, impropriety or fraud;
* Failure to comply with legal obligations or statute;
* Dangers to Health, Safety or the Environment;
* Criminal activity;
* Improper conduct or unethical behaviour;
* Any attempts to conceal any malpractice or wrongdoing.

Speaking up about any concerns you have at work is really important. It is vital that you do because it will help us to keep improving our business and the working environment for each other.

We understand that you may feel worried about raising a concern, but please don’t be put off. We will look into what you say and you will have access to any support you may need during and after any investigation has taken place.

This policy is for looking into genuine concerns relating to the above, it should not be used for raising concerns about any specific terms of your employment. That type of concern is better raised via your manager, the HR team, or under our Grievance policy.

### Raising a whistleblowing concern

We hope that in the majority of cases you will be able to raise any concerns you have, informally with your line manager. You can tell them in person, or in writing, whichever you prefer. They may be able to agree a way of resolving your concern quickly and efficiently.

If you are unable to resolve the issue informally, please raise the concern by putting the details in writing and address it to the HR department. You should make it clear that you are making the disclosure under CMD’s Whistleblowing policy. This will make sure that whoever receives the disclosure understands the nature of the concerns being raised and takes the right actions to investigate and protect your identity.

You should treat any information about the investigation as confidential. While we cannot always guarantee the outcome you seek, we will always deal with your concern fairly and appropriately.

### Investigating a whistleblowing concern

We are committed to listening to you, learning lessons and improving our business. When a formal concern is raise, it will be recorded and you will receive an acknowledgement.

The investigation conducted will be objective and evidence-based. We will provide a report that focuses on identifying and rectifying any issues and lessons learned to make sure we don’t have problems reoccurring.

It may be decided that your concern would be better considered under a different process; for example our process for dealing with bullying or harassment. If so we will let you know why we have made that decision and what to expect next.

If you are not happy with the way your concern has been handled you can raise it, in writing to Andy Fraser, Financial Director. You will receive an acknowledgement on receipt.

### Communication

Any concerns that you raise, will be discussed with you. This is to make sure that we understand exactly what you are concerned about. We will let you know how long you can expect the investigation to last and will keep you informed with its progress, whilst respecting the confidentiality of others who may be involved.

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### Confidentiality

We are hopeful that you feel comfortable enough to raise any concern openly, but also realise that you may wish to raise it confidentially. This means that only the individual you have raised your concern to is aware of your identity. If you do this, we will keep your identity confidential, unless required to disclose it by law; for example, by the police. You can chose to raise concerns anonymously, however without providing your name, it will make it harder for us to investigate and give you feedback on the outcome.

If you would like to seek advice on this, you can speak to the independent whistleblowing charity, Protect. They offer a confidential helpline and their details are at the end of this policy.

### External disclosures

In most cases, it should not be necessary to alert anyone externally about a concern. The law does recognise that in some circumstances it may be appropriate for you to report your concern(s) to an external body such as a regulator. It will rarely, if ever, be appropriate to inform the media.

Before you report a concern to anyone external, it is strongly encouraged that you seek advice. Protect, the independent whistleblowing charity can advise on this via their helpline. They also have a list of regulators for reporting certain types of concerns.

### Protection and support for whistleblowers

It is recognised that sometimes whistleblowers are concerned and worried about possible repercussions following the reporting of a concern. We aim to encourage openness and will support you if you raise concerns under this policy, even if they turn out to be mistaken. You will be protected from any recourse or adverse treatment as a result of raising concerns under this policy.

### Contact for Protect

[Protect - Speak up stop harm - Protect - Speak up stop harm (protect-advice.org.uk)](https://protect-advice.org.uk/)

020 3117 2520