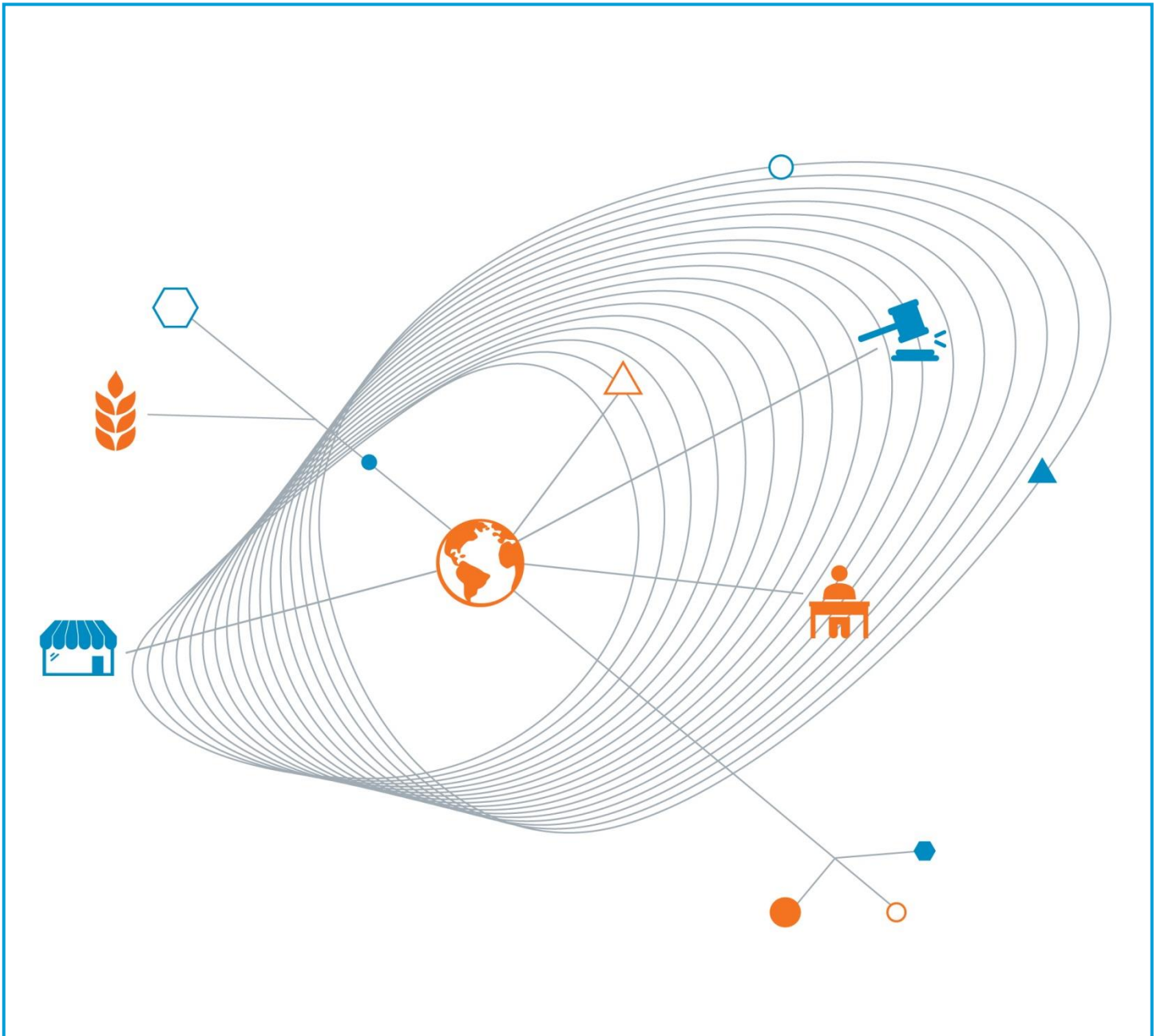





Whistleblowing Policy



DOCUMENT CONTROL SHEET

Document Title	Whistleblowing Policy
Version	V1
Status	FINAL
Authors	JC
Date	October 2016

DOCUMENT HISTORY			
Version	Date	Author	Amendments Made
V1.0	10/16	JC	Revised policy to align with TetraTech policy and procedure
V2	07/18	JC	Include procedures on CFWU reporting

SIGN - OFF					
Owner	Jim Carnegie	MD	Ben Ward	COO	Keith Onslow
Signature		Signature		Signature	

WHISTLEBLOWING POLICY

Scope

This policy applies to all individuals working at all levels, including contractors, agency staff, agents, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as workers in this policy).

In this policy, third party means any individual or organisation that we come into contact with during the course of our work, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

Policy Statement

Coffey is committed to creating a working environment that is active in respect of dealing with issues of malpractice in the workplace. We recognise that it is often staff who may in the first instance have knowledge of any issues of malpractice.

The following policy sets out definitions of malpractice and a framework for public interest whistleblowing which provides every individual in the workplace full protection from victimisation where they raise genuine concerns about malpractice, in accordance with The Public Interest Disclosure Act 1998 (The Act).

In adopting the policy, Coffey seeks to promote accountability for the organisation to its workforce, clients, regulators, funders, trustees, and to the general public, by encouraging the vigilance of staff, and implementing strong sanctions for any issue of malpractice raised in accordance with The Act.

Procedure

The procedure aims to;

- encourage workers to feel confident in raising serious concerns and to question and act upon concerns about practices;
- provide a venue for workers to raise those concerns and receive feedback on any action taken;
- ensure that workers receive a response to their concern; and
- reassure workers that they will be protected from possible reprisals or victimisation if they have a reasonable belief that they have made any disclosure in good faith.

Malpractice

There are existing procedures within the organisation to enable individuals to lodge a complaint or a grievance. The Whistleblowing Procedure, is intended to cover major concerns of malpractice, that fall outside the scope of other procedures. This includes;

- a criminal offence has been committed, is being committed or is likely to be committed;
- a person has failed, is failing or is likely to fail to comply with any legal obligation or regulatory requirements to which he or she is subject;
- a miscarriage of justice has occurred, or is about to occur;
- the health and safety of an individual has been, or is likely to be endangered;
- the environment has been, is being or is likely to be damaged;
- misuse of funds or failure to follow financial regulation;

- information that highlights any matter falling within the preceding paragraphs has been, is being or is likely to be deliberately concealed;
- a person has committed, is committing or is likely to commit an offence under the Bribery Act 2010;
- a person is or has been negligent.
- a person has reason to believe that, there is breach in human rights practices, including compliance to the Modern Slavery Act 2015 by the business or any of the business supply chain and partners.

The Public Interest Disclosure Act 1998

This Act applies to people at work raising genuine concerns about any of the above even where the information is of a confidential status or not, and whether it is occurring in the UK or overseas.

The Act covers agency staff, contractors and everybody involved within the activities of Coffey. Volunteers are not covered and protected within the Act, although Coffey is committed to ensuring that volunteers are included and treated equitably with staff in all aspects of policy development and as such will be provided with the same opportunity as paid employees to raise any concerns in respect of the above.

The Act states that, where a worker has made a 'qualifying disclosure' it is unlawful to dismiss or subject that person to any other detriment as a result of this disclosure. A 'qualifying disclosure' means any disclosure of information which, in the reasonable belief of the employee making the disclosure, tends to show one or more of the following;

- a criminal offence has been committed, is being committed or is likely to be committed;
- a person has failed, is failing or is likely to fail to comply with any legal obligation or regulatory requirements to which he or she is subject;
- a miscarriage of justice has occurred, or is about to occur;
- the health and safety of an individual has been, or is likely to be endangered;
- the environment has been, is being or is likely to be damaged;
- information that highlights any matter falling within the preceding paragraphs has been, is being or is likely to be deliberately concealed.

If you are uncertain whether something is within the scope of this policy you should seek advice from your line manager or human resources.

How to Raise a Concern?

As a first step, you should normally raise your concerns with your manager. However, if your concerns involve your manager, or the issue is particularly sensitive, you should contact human resources or your project director (if you are an independent consultant/subcontractor).

The person disclosing will have full protection under the Act or within the policy, whichever is appropriate. Anyone disclosing must have an honest and reasonable suspicion that malpractice or misconduct has occurred.

What Happens Next?

In order to protect individuals and those accused of misdeeds or possible malpractice, 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 into the scope of specific procedures, will normally be referred for consideration under those procedures.

Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required this will be taken before any investigation is conducted. Where appropriate, the matters

raised may be investigated by senior management or the board. This will depend on the nature of the issue.

We will aim to keep you informed of the progress of the investigation and its likely timetable. However, the need for confidentiality may prevent us from giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

Within 10 working days of a concern, and where we are able, you will be contacted with;

- acknowledgement that the concern has been received, indicating how we propose to deal with the matter;
- an estimate of how long it will take to provide a final response;
- statement of whether or not any initial enquiries have been made;
- advice on available support mechanisms; and
- statement of whether or not further investigations will take place and, if not, why not.

Regulatory Disclosure

Dependent upon the nature of the disclosure, the Act provides special provision for disclosure to prescribed bodies. The following may be applicable;

- Health and Safety Executive
- Local authority (accountable body)
- Data protection registrar
- HM Treasury

This list is not exhaustive and the Director or a representative of the accountable body will provide further details of an appropriate regulatory body according to the nature of the concern.

Wider Disclosures

It is hoped that by operating a policy that positively encourages whistleblowing, wider disclosure to external bodies will be limited. However, it should be noted that such disclosure is also protected under the Act.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, public concern at work, operates a confidential helpline. They also have a list of prescribed regulators, for reporting certain types of concern. Their contact details are at the end of this policy.

Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. The law allows you to raise a concern in good faith with a third party, where you reasonably believe relates mainly to their actions or something that is legally their responsibility. However, we encourage you to report such concerns internally first. You should contact your Manager, Project Director or Human Resources.

DFID Procedures on reporting

All staff involved in DFID funded business, must be aware of the process for reporting any suspicions or allegations of aid diversion, fraud, money laundering or counter terrorism finance. If you ever have a concern immediately discuss it with a manager or supervisor and contact 24/7;

Counter Fraud and Whistleblowing Unit (CFWU) at fraud@dfid.gov.uk or on +44(0)1355 843747

Confidentiality

We hope that everyone will be able to voice whistleblowing concerns openly under this policy. However, if anyone wants to raise a concern confidentially, we will make every effort to keep your identity secret. It is necessary for someone investigating the concern to know the person's identity, we will discuss this with that person.

We do not encourage anonymous disclosures. Proper investigation may be more difficult or impossible if we cannot obtain further information from the person. It is also more difficult to establish whether any allegations are credible and have been made in good faith. Whistleblowers who are concerned about possible reprisals if their identity is revealed, should come forward to Human Resources and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt you can seek advice from Public Concern at Work, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are;

- Helpline: +44 (0) 207 404 6609
- E-mail: whistle@pcaw.co.uk

If you ever have a concern about unethical, illegal or irresponsible activity, don't keep it to yourself. Discuss it with a manager or supervisor. If you prefer to remain anonymous, contact 24/7;

001 – 770 – 582 – 5289

You can reverse the charges.

Protection and Support

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support those who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a concern in good faith. If you believe you have suffered any such treatment, you should inform Human Resources immediately.

You must not threaten or retaliate against whistleblowers in any way.

False Disclosures

Coffey seeks to encourage early disclosures within the organisation and provides everyone with the full protection of the Act, any false, unfounded or malicious disclosure is a breach of the company Code of Conduct Policy. It will be treated as a serious disciplinary matter for staff and may lead to board members being removed from their position.

Linked Policies

- Health and Safety
- Confidentiality
- Environmental Policy
- Conflicts of Interest, Bribery and Corruption Policy

Compliance

All parts of this policy MUST be complied with and will be subject to internal / external review however, internal audits will focus on;

- Human Resources must ensure that each worker has read, understands and complies with this policy. This is to be documented.

- Human Resources is to ensure that all new joiners have completed the online training, and continuation training is to occur at least annually.
- Project Managers and Line Managers are responsible for ensuring that this policy is communicated to all subcontractors (firms and individuals) and is displayed in a communal area. The whistleblowing number and helpline is to be visible.
- Project Managers and Line Managers are responsible for ensuring all staff have completed the online training, and continuation training is to occur at least annually.
- Project Managers and Line Managers must declare and keep a written record of any concern.