

FestivalUK*2022

Whistleblowing Policy

Festival 2022 Ltd
March 2021

DOCUMENT CONTROL

Document Information

Document Title:	Whistleblowing Policy
Executive Owner:	Caroline McGrory, OC Group Chief Legal Officer
Approved By:	Festival Board
Date Approved:	5 March 2021
Review Date:	March 2022
EqIA Date:	14 April 2021

Version History

Version	Date Released	Originator	Authorised	Comments
1.0	February 2021	John Darnbrook	n/a	Policy drafted
1.1	February 2021	-	EMT	Policy approved
1.2	March 2021	-	Festival Board	Approved

Distribution List

Name	Organisation	Position
Dame Vikki Heywood CBE	Festival 2022 Ltd	Non-Executive Chair of Festival Board
Ian Reid	Festival 2022 Ltd / Organising Committee	Chief Executive Officer
David Grady	Festival 2022 Ltd / Organising Committee	Chief Financial Officer
Caroline McGrory	Festival 2022 Ltd / Organising Committee	Chief Legal Officer
Martin Green	Festival 2022 Ltd / Organising Committee	Chief Creative Officer
Phil Batty	Festival 2022 Ltd / Organising Committee	Executive Director
John Darnbrook	Festival 2022 Ltd	Head of Business Integration
Lucy Bailey	Festival 2022 Ltd	Senior Legal Counsel
Laurence Adams	Organising Committee	Head of Human Resources

Disclaimer

This is a proprietary Festival 2022 Limited (the Festival) document and is not to be relied upon by any person other than the Festival and its staff and those who are expressly authorised in writing to rely on the contents of this document. The Festival makes no express or implied guarantees, representations or warranties to any third party as to whether the requirements of this document will be fulfilled by the Festival, its staff, agents, contractors, authorised representatives or anyone else to whom the document relates or refers. The Festival accepts no liability for any reliance by any third party on the contents of or the procedures detailed in this document.

OC Group

Festival 2022 Ltd is a wholly owned subsidiary of the Birmingham Organising Committee for the 2022 Commonwealth Games Ltd (the "OC"). References to the OC Group refer to company group of both Festival 2022 Ltd and the OC.

1. Principles

- 1.1 This is the Festival 2022 Limited (Festival 2022) policy on whistleblowing. It is intended to help create a culture where wrongdoing can be addressed quickly and effectively, by encouraging employees and others who have serious concerns about any aspect of Festival 2022's operations to come forward and voice those concerns.
- 1.2 Festival 2022 is committed to conducting its business with honesty, propriety and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.
- 1.3 Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, facilitating tax evasion, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.
- 1.4 This policy covers all employees, non-exec Directors, officers, consultants, contractors, volunteers, interns, casual workers and agency workers (referred to collectively in this policy as "staff").
- 1.5 This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. How to raise a concern

- 2.1 Festival 2022 hopes that in most cases staff will be able to raise any concerns with their manager. However, where an individual prefers not to raise it with their manager for any reason, they should contact the Whistleblowing Officer, Caroline McGrory, who is also the Company Secretary at Caroline.McGrory@birmingham2022.com
- 2.2 If the concern involves Festival 2022's Whistleblowing Officer, then the individual raising the concern should contact Festival 2022's Chief Executive Officer and Accounting Officer instead at Ian.Reid@birmingham2022.com
- 2.3 Festival 2022 will arrange a meeting with the individual raising the concern as soon as possible to discuss the issue. The individual may bring a colleague or trade union representative to any meetings held under this policy. Any companion must respect the confidentiality of the disclosure and any subsequent investigation.
- 2.4 If the concern is related to suspected fraud, bribery or corruption, this should be dealt with via Festival 2022's Anti-Corruption, Counter-Fraud, Bribery, Gifts and Gratuities Policy.

3. Confidentiality

- 3.1 Festival 2022 hopes that all staff will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If an individual wants to raise their concern confidentially, Festival 2022 will make every effort to keep the individual's identity secret and only reveal it where necessary to those involved in investigating the concern.

4. External disclosures

4.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases staff should not find it necessary to alert anyone externally.

4.2 The law recognises that in some circumstances it may be appropriate for individuals to report their concerns to an external body such as a regulator. Staff can always seek advice about reporting a concern to an external body and Festival 2022 strongly encourages you to do so. The independent organisation 'Protect' operate a confidential helpline. Their contact details are as follows:

Helpline: (020) 3117 2520

E-mail: whistle@protect-advice.org.uk

Website: www.pcaaw.org.uk

4.3 In the event that a member of staff does not feel their concerns have been appropriately dealt with internally, they have an entitlement under the Public Interest Disclosure Act 1998 to make a complaint to an external body. The Prescribed Persons Order 2014 sets out a list of over 60 organisations and persons that individuals may approach outside their workplace to report suspected or known wrongdoing. A list of these bodies can be found at:

<https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies>

5. Protection and support for whistleblowers

5.1 Festival 2022 aims to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

5.2 Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If any staff believe that they have suffered any such treatment, they should inform the Whistleblowing Officer immediately. If the matter is not remedied to their satisfaction, staff should raise it formally using our Grievance Policy.

5.3 No staff member must threaten or retaliate against whistleblowers in any way. If anyone is involved in such conduct they may be subject to disciplinary action under our Disciplinary Action Policy.

5.4 If Festival 2022 concludes that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action under our Disciplinary Action Policy.

6. Monitoring

6.1 The Chief Legal Officer will monitor the implementation of this policy and any subsequent revisions. This will include:

- Monitoring incidents of internal reports of whistleblowing with a view to making any necessary amendments to the content of this or other related policies and

- procedures; and
- Monitoring whistleblowing concerns made by individuals to external bodies of which the Chief Legal Officer has been made aware.

7. Review

7.1 This policy will be subject to review annually after its date of approval. Earlier review may be required if any of the following occur:

- The adoption of the policy highlights any errors or omissions in its content.
- Following monitoring of whistleblowing incidents by the Chief Legal Officer, amendments are required to the content of the policy.
- Where relevant changes in legislation or national guidance impact upon the content of this policy.