

THE FARADAY INSTITUTION

Code of conduct for contractors

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Contractors code of conduct

1. Introduction

The Faraday Institution is the nation’s independent institute for electrochemical energy storage science and technology, supporting research, training, and analysis. Bringing together expertise from universities and industry, The Faraday Institution will make the UK the go-to place for the research, development, manufacture and production of new electrical storage technologies for the automotive and the other sectors.

We are an equal opportunities employer and do not discriminate on the grounds of gender, sexual orientation, marital or civil partner status, pregnancy or maternity, gender reassignment, race, colour, nationality, ethnic or national origin, religion or belief, disability or age.

2. Applying the code of conduct

This document sets out the main policies and procedures that you will need to be aware of while working for us. Any questions you may have should be referred to main contact within the Faraday Institution or can be addressed to contracts@faraday.ac.uk

The policies and procedures set out in this handbook apply to all contractors unless otherwise indicated. They do not form part of the terms of your contract with us, which are provided to you separately.

3. Responsibility for the code of conduct

The Chief Executive has overall responsibility for this document for ensuring that its policies and procedures comply with our legal obligations.

Failure to comply with any of the policies in the code of conduct may result in termination of your contract with the Faraday Institution.

4. Contact details

We will request contact details in order to contact you in relation to your work with us. You should advise of any changes straight away. Information is held in confidence and used in accordance with data protection laws.

5. Dress code

In situations where you work in our offices or at meetings with third parties for us you represent us with stakeholders and the public. Your appearance contributes to our reputation and the development of our objectives. We therefore require everyone to maintain an appropriate professional standard of dress and personal appearance at work at all times.

Where we provide safety clothing and equipment, including protective footwear and eyewear, it should be worn or used as appropriate and directed and you should not wear clothing, jewellery or footwear that could present a health and safety risk.

You may wear appropriate religious and cultural dress (including clerical collars, head scarves, skullcaps and turbans) unless it creates a health and safety risk to you or any other person or otherwise breaches this policy.

6. Expenses policy

Where you contract with us states that we will reimburse expenses, these should be properly incurred in accordance with this policy. Contractors should be aware that the Faraday Institution is a charity and is funded with public money. It is therefore expected that contractors will act at all times in accordance with the values and behaviour appropriate to such an organisation and with regard to value for money.

Expenses should be:

- submitted to the Finance Department on the [appropriate claim form](#);
- submitted within 28 days of being incurred;
- supported by relevant itemised documents (for example, VAT receipts, tickets. Note: credit card slips must also be accompanied by itemised receipts); and
- authorised by the employee's line manager.
- Failure to comply with this may result in delays or non-reimbursement of expenses.
- Where employees are travelling together and sharing expenses, payment should not be made by an employee whose line manager is also present.

Claims for authorised expenses submitted in accordance with this policy will be paid directly into your bank account.

Any questions about the reimbursement of expenses should be put to your line manager before you incur the relevant costs.

6.1 Travel expenses

We will reimburse the reasonable cost of necessary travel in connection with our business. You should always choose the most economic means of travel practicable and you should use existing travelcards or season tickets wherever possible. The following are not treated as travel in connection with our business:

- travel between your home and usual place of work;
- travel which is mainly for your own purposes; and
- travel which, while undertaken on our behalf, is similar or equivalent to travel between your home and your usual place of work.
- Any exceptions to the guidelines below must be justified on business grounds and with prior approval of your manager.

6.2 Trains.

Travel should be second class.

6.3 Taxis.

Where public transport is available, taxis should only be used if it is more cost effective due to a significant saving of journey time or the number of individuals travelling together.

6.4 Car.

Where it is cost effective for you to use your car for business travel, and you have been authorised to do so, you can claim a mileage allowance on proof of mileage. Details of the current mileage rates can be obtained from the Finance Department. You can also claim for any necessary parking costs. It is your responsibility to ensure that you are adequately insured, that your car is correctly taxed and in roadworthy condition and that you have a valid driving licence.

6.5 Air travel.

If you are required to travel by plane in the course of your duties, you should discuss travel arrangements with us in advance.

6.6 Accommodation and other overnight expenses

If you are required to stay away overnight in the course of your duties, you should agree accommodation arrangements with your line manager in advance. Accommodation is subject to an upper limit per night of £150 (London) or £100 (outside London). Spending on hotels outside the UK should be agreed with the Chief Financial Officer.

We will reimburse your reasonable out-of-pocket expenses for overnight stays provided they are supported by receipts as follows:

- (a) breakfast up to a maximum of £15 a day; and
- (b) lunch and an evening meal including drinks up to £25 a day for lunch, £40 a day for an evening meal or, where both are incurred on the same day, an overall maximum of £65.

Again, these amounts are maxima and staff are encouraged to make the most efficient use of resources, consistent with the Faraday Institution's charitable role. We do not pay for personal items included on hotel bills including mini-bar, newspapers, laundry, videos, gym-usage etc.

6.7 Entertaining

You may entertain actual or prospective business contacts and stakeholders only where your proposal and an appropriate budget has been agreed in writing in advance with us.

You must also ensure that the provision of any such hospitality in the circumstances complies with our Anti-Corruption and Bribery Policy.

7. Social Media policy

- 7.7 This policy is in place to minimise the risks to our business through use of social media.
- 7.8 This policy deals with the use of all forms of social media, including Facebook, LinkedIn, Twitter, Google+, Instagram and all other social networking sites, internet postings and blogs. It applies to use of social media for business purposes as well as personal use that may affect our business in any way.
- 7.9 Occasional personal use of social media during working hours is permitted so long as it does not involve unprofessional or inappropriate content, does not interfere with your employment responsibilities or productivity and complies with this policy.
- 7.10 You must avoid making any social media communications that could damage our business interests or reputation, even indirectly.
- 7.11 You must not use social media to defame or disparage us, our staff or any third party; to harass, bully or unlawfully discriminate against staff or third parties; to make false or misleading statements; or to impersonate colleagues or third parties.
- 7.12 You must not express opinions on our behalf via social media, unless expressly authorised to do so by the Head of Engagement. You may be required to undergo training in order to obtain such authorisation.
- 7.13 You must not post comments about sensitive business-related topics, such as our performance, or do anything to jeopardise our trade secrets, confidential information and intellectual property. You must not include our logos or other trademarks in any social media posting or in your profile on any social media without the express authority of the Head of Engagement.
- 7.14 The contact details of business contacts made during the course of your employment are our confidential information. On termination of employment you must provide us with a copy of all such information.
- 7.15 Any misuse of social media should be reported to your line manager.
- 7.16 You should make it clear in social media postings, or in your personal profile, that you are speaking on your own behalf. Write in the first person and use a personal e-mail address.
- 7.17 Be respectful to others when making any statement on social media and be aware that you are personally responsible for all communications which will be published on the internet for anyone to see.

- 7.18 If you disclose your affiliation with us on your profile or in any social media postings, you must state that your views do not represent those of your employer (unless you have been expressly authorised to speak on our behalf by the Head of Engagement). You should also ensure that your profile and any content you post are consistent with the professional image you present to clients and colleagues.
- 7.19 If you are uncertain or concerned about the appropriateness of any statement or posting, refrain from posting it until you have discussed it with your manager.
- 7.20 If you see social media content that disparages or reflects poorly on us, you should contact your manager.

8. Health and safety policy

This policy sets out our arrangements for ensuring we meet our health and safety obligations to staff and anyone visiting our premises or affected by our work.

The Faraday Institution Chief Executive has overall responsibility for health and safety and the operation of this policy.

8.1 Your responsibilities

All staff share responsibility for achieving safe working conditions. You must take care of your own health and safety and that of others, observe applicable safety rules and follow instructions for the safe use of equipment.

You should report any health and safety concerns immediately to your Faraday Institution contact or to the Faraday Institution Chief Executive.

You must co-operate with managers on health and safety matters, including the investigation of any incident.

8.2 Training

We will ensure that you are given adequate training and supervision to perform your work competently and safely.

8.3 Equipment

You must use equipment in accordance with any instructions given to you. Any equipment fault or damage must immediately be reported. Do not attempt to repair equipment unless trained to do so.

8.4 Accidents and first aid

Details of first aid facilities and the names of trained first aiders are displayed on the notice boards.

All accidents and injuries at work, however minor, should be reported to the Faraday Institution Chief Executive and recorded in the Accident Book which is kept in the office.

8.5 Fire safety

All staff and visitors should familiarise themselves with the fire safety instructions, which are displayed on notice boards and near fire exits in the workplace.

If you hear a fire alarm, leave the building immediately by the nearest fire exit and go to the fire assembly point shown on the fire safety notices.

Fire drills will be held at least every 12 months and must be taken seriously. We also carry out regular fire risk assessments and regular checks of fire extinguishers, fire alarms, escape routes and emergency lighting.

8.6 Risk assessments and measures to control risk

We carry out general workplace risk assessments periodically. The purpose is to assess the risks to health and safety of employees, visitors and other third parties as a result of our activities, and to identify any measures that need to be taken to control those risks.

8.7 Smoking policy

We are committed to protecting your health, safety and welfare and that of all those who work for us by providing a safe place of work and protecting all workers, service users, customers and visitors from exposure to smoke.

All of our workplaces (including our vehicles) are smoke-free in accordance with the Health Act 2006 and associated regulations. All staff and visitors have the right to a smoke-free environment.

Smoking is not permitted anywhere in our workplace. The ban applies to anything that can be smoked and includes, but is not limited to, cigarettes, electronic cigarettes, pipes (including water pipes such as shisha and hookah pipes), cigars and herbal cigarettes.

Anyone using our vehicles, whether as a driver or passenger, must ensure the vehicles remain smoke-free. Any of our vehicles that are used primarily for private purposes are excluded from the smoking ban.

You may only smoke outside during breaks. When smoking outside, you must dispose of cigarette butts and other litter appropriately.

Smoking in smoke-free premises or vehicles is also a criminal offence and may result in a fixed penalty fine and/or prosecution.

9. Fair processing notice

During the course of our activities we, The Faraday Institution, will process personal data (which may be held on paper, electronically, or otherwise) about our staff and contractors and we recognise the need to treat it in an appropriate and lawful manner, in accordance with the Data Protection Act 1998 (DPA) or any equivalent regulations. The purpose of this notice is to make you aware of how we will handle your personal data.

9.1 Data protection principles

We will comply with the eight data protection principles in the DPA, which say that personal data must be:

- Processed fairly and lawfully.
- Processed for limited purposes and in an appropriate way.
- Adequate, relevant and not excessive for the purpose.
- Accurate.
- Not kept longer than necessary for the purpose.
- Processed in line with individuals' rights.
- Secure.
- Not transferred to people or organisations situated in countries without adequate protection.

"Personal data" means recorded information we hold about you from which you can be identified. It may include contact details, other personal information, photographs, expressions of opinion about you or indications as to our intentions about you.

"Processing" means doing anything with the data, such as accessing, disclosing, destroying or using the data in any way.

9.2 Fair and lawful processing

We will usually only process your personal data where you have given your consent or where the processing is necessary to comply with our legal obligations. In other cases, processing may be necessary for the protection of your vital interests, for our legitimate interests or the legitimate interests of others. The full list of conditions is set out in the DPA.

We will only process "sensitive personal data" about ethnic origin, political opinions, religious or similar beliefs, trade union membership, health, sex life, criminal proceedings or convictions, where a further condition is also met. Usually this will mean that you have given your explicit consent, or that the processing is legally required. The full list of conditions is set out in the DPA.

9.3 How we are likely to use your personal data

We will process data about staff and contractors for legal, personnel, administrative and management purposes and to enable us to meet our legal obligations.

We may process sensitive personal data relating to staff including, as appropriate:

9.4 Processing for limited purposes

We will only process your personal data for the specific purpose or purposes notified to you or for any other purposes specifically permitted by the DPA.

9.5 Adequate, relevant and non-excessive processing

Your personal data will only be processed to the extent that it is necessary for the specific purposes notified to you.

9.6 Accurate data

We will keep the personal data we store about you accurate and up to date. Data that is inaccurate or out of date will be destroyed. Please notify us if your personal details change or if you become aware of any inaccuracies in the personal data we hold about you.

9.7 Data retention

We will not keep your personal data for longer than is necessary for the purpose. This means that data will be destroyed or erased from our systems when it is no longer required.

9.8 Processing in line with your rights

You have the right to:

- Request access to any personal data we hold about you.
- Prevent the processing of your data for direct-marketing purposes.
- Ask to have inaccurate data held about you amended.
- Prevent processing that is likely to cause unwarranted substantial damage or distress to you or anyone else.
- Object to any decision that significantly affects you being taken solely by a computer or other automated process.

9.9 Data security

We will ensure that appropriate measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

We have in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. We will only transfer personal data to a third party if he agrees to comply with those procedures and policies, or if he puts in place adequate measures himself.

Maintaining data security means guaranteeing the confidentiality, integrity and availability (for authorised purposes) of the personal data.

9.10 Providing information to third parties

We will not disclose your personal data to a third party without your consent unless we are satisfied that they are legally entitled to the data. Where we do disclose your personal data to a third party, we will have regard to the eight data protection principles.

9.11 Subject access requests

If you wish to know what personal data we hold about you, you must make the request in writing. All such written requests should be forwarded to the Chief Financial Officer.

10. Equality and diversity policy

The Faraday Institution is committed to promoting equal opportunities in employment. All staff and any job applicants and contractors will receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (**Protected Characteristics**).

This policy sets out our approach to equal opportunities and the avoidance of discrimination at work. It applies to all aspects of employment with us, including recruitment, pay and conditions, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.

10.1 Discrimination

You must not unlawfully discriminate against or harass other people including current and former employees, job applicants, clients, customers, suppliers and visitors. This applies in the workplace, outside the workplace (when dealing with customers, suppliers or other work-related contacts), and on work-related trips or events including social events.

The following forms of discrimination are prohibited under this policy and are unlawful:

- Direct discrimination: treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of their religious views or because they might be gay.
- Indirect discrimination: a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others, and is not justified. For example, requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.

- Harassment: this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt with further in our Anti-harassment and Bullying Policy.
- Victimisation: retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.
- Disability discrimination: this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

10.2 Recruitment and selection

Recruitment, promotion and other selection exercises such as redundancy selection will be conducted on the basis of merit, against objective criteria that avoid discrimination. Shortlisting should be done by more than one person if possible.

Vacancies should generally be advertised to a diverse section of the labour market. Advertisements should avoid stereotyping or using wording that may discourage particular groups from applying.

Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.

Job applicants should not be asked about health or disability before a job offer is made, except in the very limited circumstances allowed by law: for example, to check that the applicant could perform an intrinsic part of the job (taking account of any reasonable adjustments), or to see if any adjustments might be needed at interview because of a disability. Where necessary, job offers can be made conditional on a satisfactory medical check. Health or disability questions may be included in equal opportunities monitoring forms, which must not be used for selection or decision-making purposes.

10.3 Disabilities

If you are disabled or become disabled, we encourage you to tell us about your condition so that we can consider what reasonable adjustments or support may be appropriate.

10.4 Part-time and fixed-term work

Part-time and fixed-term employees should be treated the same as comparable full-time or permanent employees and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate), unless different treatment is justified.

10.5 Breaches of this policy

We take a strict approach to breaches of this policy, which will be dealt with in accordance with our Disciplinary Procedure. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal.

If you believe that you have suffered discrimination you can raise the matter through our Grievance Procedure or Anti-harassment and Bullying Policy. Complaints will be treated in confidence and investigated as appropriate.

You must not be victimised or retaliated against for complaining about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our Disciplinary Procedure.

11. Anti-harassment and bullying policy

The Faraday Institution is committed to providing a working environment free from harassment and bullying and ensuring all staff are treated, and treat others, with dignity and respect.

This policy covers harassment or bullying which occurs at work and out of the workplace, such as on business trips or at work-related events or social functions. It covers bullying and harassment by staff (which for these purposes may include consultants, contractors and agency workers) and also by third parties such as customers, suppliers or visitors to our premises.

11.1 What is harassment?

Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment.

It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation. Harassment is unacceptable even if it does not fall within any of these categories.

Harassment may include, for example:

- unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing;
- unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless);
- offensive e-mails, text messages or social media content;
- mocking, mimicking or belittling a person's disability.

A person may be harassed even if they were not the intended "target". For example, a person may be harassed by racist jokes about a different ethnic group if the jokes create an offensive environment.

11.2 What is bullying?

Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority but can include both personal strength and the power to coerce through fear or intimidation.

Bullying can take the form of physical, verbal and non-verbal conduct. Bullying may include, by way of example:

- physical or psychological threats;
- overbearing and intimidating levels of supervision;
- inappropriate derogatory remarks about someone's performance;

Legitimate, reasonable and constructive criticism of a worker's performance or behaviour, or reasonable instructions given to workers in the course of their employment, will not amount to bullying on their own.

11.3 If you are being harassed or bullied

If you are being harassed or bullied, consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome or makes you uncomfortable. If this is too difficult or embarrassing, you should speak to your line manager, who can provide confidential advice and assistance in resolving the issue formally or informally.

If informal steps are not appropriate, or have not been successful, you should raise the matter formally under our Grievance Procedure.

We will investigate complaints in a timely and confidential manner. The investigation will be conducted by someone with appropriate experience and no prior involvement in the complaint, where possible. Details of the investigation and the names of the person making the complaint and the person accused must only be disclosed on a "need to know" basis. We will consider whether any steps are necessary to manage any ongoing relationship between you and the person accused during the investigation.

Once the investigation is complete, we will inform you of our decision. If we consider you have been harassed or bullied by an employee the matter will be dealt with under the Disciplinary Procedure as a case of possible misconduct or gross misconduct. If the harasser or bully is a third party such as a customer or other visitor, we will consider what action would be appropriate to deal with the problem. Whether or not your complaint is upheld, we will consider how best to manage any ongoing working relationship between you and the person concerned.

11.4 Protection and support for those involved

Staff who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under our Disciplinary Procedure.

11.5 Record-keeping

Information about a complaint by or about an employee may be placed on the employee's personnel file, along with a record of the outcome and of any notes or other documents compiled during the process. These will be processed in accordance with data protection laws.

12. Anti-corruption and bribery policy

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, Chief Executives, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

12.1 What is bribery?

Bribe means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

Bribery includes offering, promising, giving, accepting or seeking a bribe.

All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with your manager or the Chief Financial Officer.

Specifically, you must not:

- give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
- accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else;
- give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure.

You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

12.2 Gifts and hospitality

This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our role and services. However, these circumstances are

likely to be exceptional and you will need the written approval of the Chief Financial Officer before giving or accepting a gift.

In general, a gift or hospitality will not be appropriate if it is unduly lavish or extravagant, or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).

Gifts must never include cash or cash equivalent (such as vouchers) or be given in secret.

Promotional gifts of low value such as branded stationery may be given to or accepted from existing suppliers and business partners.

12.3 How to raise a concern

If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify the Chief Financial Officer, the Chief Executive or the Chairman or report it in accordance with our Whistleblowing Policy as soon as possible.

12.4 Record-keeping

You must declare and keep a written record of all hospitality or gifts given or received. You must also submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure.

All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

13. Whistleblowing policy

We are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.

This policy covers all employees, officers, consultants, contractors, volunteers, interns, casual workers and agency workers.

13.1 What is whistleblowing?

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, facilitation of 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.

13.2 How to raise a concern

We hope that in many cases you will be able to raise any concerns with your manager and/ or the Faraday Institution Chief Executive. However, where you prefer not to raise it with your management for any reason, you should contact the Chairman.

We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

13.3 Confidentiality

We hope that staff will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

13.4 External disclosures

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

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. We strongly encourage you to seek advice before reporting a concern to anyone external.

13.5 Protection and support for whistleblowers

We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the Chairman immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action. In some cases, the whistleblower could have a right to sue you personally for compensation in an employment tribunal.

However, if we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.