

ENGLISH TOURING OPERA

WHISTLEBLOWING POLICY

This policy applies to all employees, officers, contractors, singers, players, production team members, technicians, creative artists, volunteers, casual workers and associates of English Touring Opera.

Introduction

The English Touring Opera is committed to the highest possible standards of openness, probity and accountability. In line with that commitment we expect our employees, freelance associates and others that we deal with, who have concerns about any aspect of ETO's work to come forward and voice those concerns.

This policy is in addition to ETO's Complaints Policy. Employees are responsible for making freelance associates aware of the existence of this policy.

This policy does not form part of any employee's contract of employment and ETO may amend it at any time.

Aims and Scope

This policy aims to:

- encourage you to feel confident in raising concerns, in the knowledge that your concerns will be taken seriously and investigated as appropriate, and that your confidentiality will be respected.
- provide avenues for you to raise those concerns and receive feedback on any action taken
- reassure you that you should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

What is whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- a) criminal activity;
- b) failure to comply with any legal obligation;
- c) miscarriages of justice;
- d) danger to health and safety;
- e) damage to the environment; or
- f) the deliberate concealment of any of the above matters.

A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases you should use the Grievance Procedure or Anti Bullying and Anti Harassment Policy as appropriate.

If you are uncertain whether something is within the scope of this policy you should seek advice from the appointed Board Recipient, whose contact details are at the end of this policy.

How to raise a concern

ETO hopes that in many cases you will be able to raise any concerns with your immediate manager. You may tell them in person or put the matter in writing if you prefer. If you choose to tell them in writing you should try to include the following:

- the background and history of the concern (giving relevant dates);
- the reason for the concern

You should try to report your concern at the earliest opportunity.

Your immediate manager may be able to agree a way of resolving the concern quickly and effectively. In some cases, they may refer the matter to the Executive Director, or ultimately the Board Recipient.

However, where the matter is more serious, or you feel that your immediate manager has not addressed your concern or you prefer not to raise it with them for any reason, you should contact the Executive Director, or Board Recipient. Their details are at the end of this policy. The Board Recipient may decide to refer complaint back to management if he/she feels that management can appropriately investigate the complaint without any conflict of interest.

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

Confidentiality

ETO hopes that staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

ETO does not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more

difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Board Recipient 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.

Investigation and outcome

Once you have raised a concern, ETO will carry out an initial assessment to determine the scope of any investigation. ETO will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

In some cases ETO may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable ETO to minimise the risk of future wrongdoing. These recommendations may be passed to the Chief Executive/General Director and Finance Committee Chair or ETO's auditors, as appropriate.

ETO will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us 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.

Due to the varied nature of these sorts of complaints, which may involve internal investigators, it is not possible to lay down precise timescales for such investigations. The investigator(s) should ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations.

If ETO concludes that a whistleblower has made false allegations maliciously, the whistleblower will be subject to disciplinary action.

If you are not satisfied

While ETO cannot always guarantee the outcome you are seeking, it will try to deal with your concern fairly and in an appropriate way. By using this policy you can help ETO to achieve this.

If you are not happy with the way in which your concern has been handled, you can raise it with the Chief Executive/General Director. Alternatively, you may contact the Board Recipient. Contact details are set out at the end of this policy.

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. 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.

Protection and support for whistleblowers

ETO recognises that the decision to report a concern can be a difficult one to make. ETO aims to encourage openness and will support anyone who raises genuine concerns under this policy, even if they turn out to be mistaken.

Any investigation into allegations of potential malpractice will not influence or be influenced by any disciplinary or redundancy procedures that already affect staff.

Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Board Recipient 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.

Responsible officer

The Board Recipient (who is also the Monitoring Officer) has overall responsibility for the maintenance and operation of this policy. He or she will maintain a record of concerns raised and the outcome (but in a form which does not endanger confidentiality) and will report as necessary to the full Board of ETO.

The contact details for the current Board Recipient are as follows:

Name: Jane Davies

Email address: jane.davies@polidori.co.uk

ADOPTED: ETO Board Meeting 14.06.18.

Signed:



Jane-Eve Straughton

Executive Director (General Manager/Finance Director at time of first adoption)

TO BE REVIEWED 17.09.19.

ADOPTED AT BOARD MEETING 17.06.19.

