



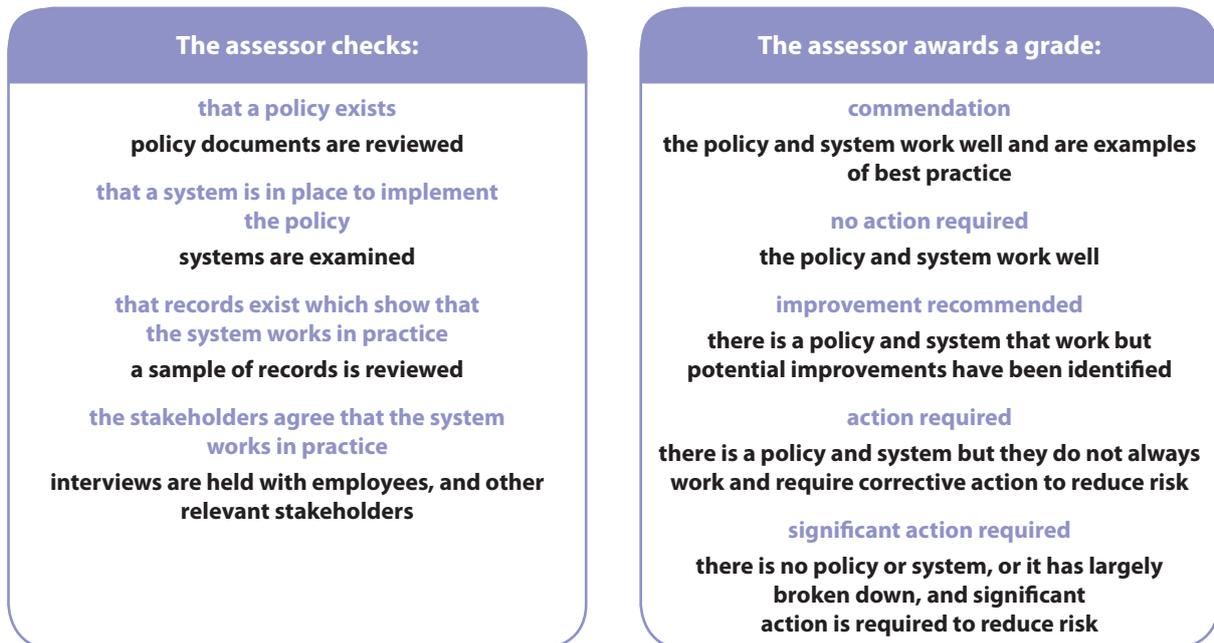
The GoodCorporation Whistleblowing Framework

GoodCorporation has developed this evaluation Framework to help organisations ensure that stakeholders are able to raise concerns about the organisation's activities without fear.

GoodCorporation believes this is best done through:

- Encouraging an open-door culture of communication and consultation with stakeholders where they can raise concerns directly with managers
- Implementing an effective grievance policy for employees' personal grievances
- Putting in place a trusted whistleblowing policy for concerns which stakeholders believe cannot be raised through any other means.

The core whistleblowing contents of this Framework are based on the proposed Code of Practice from Public Concern at Work's Whistleblowing Commission Report (November 2013).



This framework can be used for internal self-assessment or as the basis of an external review by GoodCorporation. For every assessment a report is provided, giving an independent analysis and grade for each practice. The assessment report is intended for internal management purposes only. It is the decision of the assessed organisation whether the content of the report or grades awarded are made public. Where content is made public, GoodCorporation requires that it is a balanced summary of GoodCorporation's report.

This Framework assesses the robustness of an organisation's processes for enabling stakeholders to raise concerns about its activities without fear. It is not intended to serve as legal advice or as a tool for investigating specific incidents or allegations of malpractice. GoodCorporation accepts no liability to third parties for the actions of the assessed organisation or its employees.

Leadership

The organisation promotes an open-door culture where issues and concerns are discussed openly and without fear of recrimination or detriment.

1. The top management of the organisation demonstrates a clear commitment to an open-door culture where stakeholders can raise concerns without fear.
2. Overall responsibility for the open-door culture of the organisation rests clearly with the top management.
3. There are effective employee communication processes in place.
4. There are effective employee consultation processes in place.
5. Employees and other stakeholders are encouraged to raise any concerns openly with the organisation's management.
6. Employee appraisals are used to re-enforce the organisation's open-door culture.

Grievance Policy

The organisation has a policy so that employees can raise grievances where they believe that the organisation has not treated them fairly.

7. There is a clear written policy covering the raising and handling of employee grievances.
8. The grievance policy includes a clear process to ensure that all grievances are fairly assessed and managed.
9. The grievance policy confirms that employees will not suffer detriment for having raised a legitimate grievance.

Whistleblowing Policy and Investigations

The organisation has a whistleblowing policy so that employees and other stakeholders can raise any serious concerns about a danger, risk, malpractice or wrongdoing which affects others. Such concerns are treated confidentially and are investigated properly.

10. There is a clear whistleblowing policy covering the raising, handling and investigation of serious concerns. All such concerns are managed confidentially.
11. The whistleblowing policy is managed as independently as possible from the day-to-day running of the organisation.
12. The whistleblowing policy covers the disclosure of dangers, risks, malpractice or wrongdoing that affects others.
13. The whistleblowing policy is open to all relevant stakeholders and identifies to whom concerns should be raised and how they should be raised.
14. The whistleblowing policy sets out how and by whom concerns will be handled and investigated.
15. Investigations are carried out confidentially, impartially, thoroughly and against a defined timeframe.

16. Proper records are maintained for all cases and investigations.
17. Whistleblowers are kept informed about the investigation process as far as possible.
18. Whistleblowers are informed, where appropriate, of the outcome of the investigation.
19. The whistleblowing process keeps the whistleblower's identity confidential if requested, unless disclosure is required by law.
20. The whistleblowing policy confirms that the whistleblower will not suffer detriment for having raised a concern, unless it is proven that the whistleblower knowingly provided false information.
21. The whistleblowing policy encourages the whistleblower to report any detriment suffered for having raised a concern.
22. The whistleblowing policy clearly indicates that any employee who subjects a whistleblower to detriment for raising a concern will be sanctioned.
23. The whistleblowing policy informs whistleblowers that they are entitled to independent advice and explains how to access it.
24. The whistleblowing policy makes clear whether anonymous reporting is allowed and how anonymous reporting will be handled.

Communication and Training

The organisation reinforces its open-door culture, grievance policy and whistleblowing policy with effective communication and training.

25. The organisation's open-door culture, grievance policy and whistleblowing policy are clearly communicated internally, with the whistleblowing policy also communicated externally.
26. There is regular and clear training for employees on the organisation's open-door culture, grievance policy and whistleblowing policy.
27. The organisation's published annual report includes information about the effectiveness of the whistleblowing policy.

Feedback, Monitoring and Independent Oversight

The organisation supports its open-door culture, grievance policy and whistleblowing policy with monitoring, feedback and independent oversight.

28. The organisation conducts periodic audits of the effectiveness of its approach to receiving and handling concerns, grievances and whistleblowing cases.
29. The organisation obtains feedback from employees on a periodic basis on the awareness and effectiveness of its open-door culture, grievance policy and whistleblowing policy.
30. There is independent oversight and review by the Board (or equivalent body) of the organisation's approach to receiving and handling concerns, grievances and whistleblowing cases.