SPEAKING UP POLICY

Complaints against members

All members must abide by the ACT's Ethical Code (the 'Code') which sets out a framework for the conduct of treasury activities. The fundamental philosophy behind the Code is that treasurers should act in accordance with the highest professional standards.

In the event that a member contravenes the Code, a complaint may be made against him under the ACT's Disciplinary Rules (the 'Rules') and the individual concerned may become liable to disciplinary action in accordance with the Rules.

The ACT's Ethical Code and Disciplinary Rules may be viewed at https://www.treasurers.org/governance/ethicalcode

Any person who suspects that a member is in breach of the Code should raise their concern, in writing, with the Chief Executive and an investigation in accordance with the Rules will take place.

Where the grounds for concern are in respect of a potential breach of the Ethical Code by the Chief Executive, member of Council, member of a committee or any member of staff who is also a member of the ACT then the matter should, in the first instance, be raised with the Audit, Risk and Appointments Committee ('ARAC') following the procedure set out below. After investigation and if appropriate, ARAC may then invoke the ACT's Disciplinary Rules.

Concerns about the conduct of the ACT's management team, Council or committees

The ACT is committed to conducting its business to the highest possible standards. Any person with a genuine concern about an employee of the ACT, a Council Member or any member of a business committee, working group or board may raise this in confidence, directly with ARAC.

The ACT has policies and procedures in place to deal with concerns raised by employees; however, if an employee feels it is inappropriate, impractical or too sensitive to raise concerns using the established procedures they may, in confidence, report their concerns directly to any member of ARAC.

Complainants can expect ARAC to deal with their concern in a responsible manner, to respect confidentiality and to take appropriate action. ARAC will also ensure that no detriment is suffered by individuals who follow this procedure provided the concern is raised in good faith and reasonable to the circumstances at the time.

Grounds for raising a concern

Matters giving grounds for raising a concern include actions which:

- may constitute a criminal offence;
- involve danger to the health and safety of any person;
- are likely to breach a legal obligation;
- may constitute an impropriety concerning financial reporting or the misuse of ACT funds;
- involve breaches of confidentiality;
- involve behaviours which are likely to bring the ACT into disrepute;
- involve significant damage or the potential for significant damage to the environment;
- involve the deliberate concealing of information about any of the above

How to raise a concern

In the first instance concerns may be raised informally with the Chair of ARAC or the ACT President. If it is then felt appropriate, or if the matter is considered to be particularly serious or urgent, a formal complaint may be made in writing.

Once a complaint is received, ARAC will conduct a proportionate and independent investigation into the allegation(s). As far as possible the confidentiality of the complainant will be respected, however, in order to investigate the concerns properly it may be necessary to gain consent for other individuals to be informed. The complainant may request anonymity, but this may affect ARAC's ability to investigate the concerns.

The investigation will be conducted and concluded as quickly as possible. Once ARAC's conclusions have been finalised, any necessary action will be taken. This could include either reporting the matter to an appropriate external government department, regulatory agency or the police and/or taking disciplinary action against the individual(s) concerned in accordance with the ACT's Rules and Procedures for employees and/or the ACT's Disciplinary Rules for members, students and affiliates. ARAC will advise the complainant of the outcome of the investigation. If no action is to be taken, the reasons for this will be explained.

The investigation, the outcome of the investigation and any report prepared as a result must be treated as confidential unless notified otherwise. Any breach of this confidentiality may in itself lead to disciplinary action.

Contact details

ARAC (From 1 May 2026)		
Malcolm Cooper	Chair	malcolmccooper@btinternet.com
Tariq Kazi	President	tariqkazi@outlook.com
Stuart Case	Deputy President	
Tracey Killen	ARAC member	
Chiluba Mulenga	ARAC member	
Dino Nicolaides	ARAC member	
Simon Viney	ARAC member	
ACT Executive		
Annette Spencer	Chief Executive	aspencer@treasurers.org 020 7847 2511

Complaints made in writing should be addressed to one of the individuals listed above, marked 'private & confidential' and sent to The Association of Corporate Treasurers, 10 Lower Thames Street, London EC3R 6AF.